

Appendix H.

Public Comment, Public Hearing, and Response

H-1 Legal Notification of Public Comment Period

H-2 Public Comments Received

H-3 Transcript of Public Hearing

H-4 Responses to Comments

Appendix H-1.

Legal Notification of Public Comment Period



STATE OF IDAHO

DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton, Boise, ID 83706-1255, (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Director

October 23, 2001

**To all parties interested in the Northern Ada County
Carbon Monoxide Limited Maintenance Plan**

The Department of Environmental Quality (DEQ) is scheduling a public hearing during the regular thirty (30) day comment period on this project. The attached legal notice includes more detailed information on the hearing and comment period, and where you can view the proposed plan.

The public hearing is scheduled for November 27 at 7:00 p.m. in the Department of Environmental Quality, Conference Room B, located at 1410 N. Hilton, Boise, Idaho. Written comments will be accepted until 5:00 p.m., November 28, 2001.

If you have any questions about the comment period or hearing on this proposed permit, please contact the Department of Environmental Quality at (208) 373-0253.

Thank you for your interest.

A handwritten signature in dark ink, appearing to read "Gary Reinhold", is written over a horizontal line.

Gary Reinhold, M.A.

Air Quality Analyst

State Air Quality Division

Department of Environmental Quality

GR/

Enclosure

cc: COF
PC file

**NOTICE OF INTENT TO AMEND A STATE PLAN REGARDING
CARBON MONOXIDE (CO) AIR QUALITY IMPROVEMENT IN THE
NORTHERN ADA COUNTY NONATTAINMENT AREA**

Notice is hereby given that the State of Idaho Department of Environmental Quality (DEQ) has scheduled a public comment period from October 25 through November 28, 2001. DEQ will conduct a public hearing on Tuesday, November 27, 2001 at 7:00 p.m. in Conference Room "B" of the DEQ offices at 1410 North Hilton, Boise.

The purpose of the hearing and comment period is to receive comments from the public on the Carbon Monoxide Limited Maintenance Plan. This plan was prepared to meet Environmental Protection Agency requirements to support redesignation of the Northern Ada County Not-Classified Carbon Monoxide Nonattainment Area to Attainment status. Northern Ada County, Idaho was designated as a Nonattainment Area for carbon monoxide in 1978. An Air Quality Improvement Plan (AQIP) was submitted to EPA in 1980, and again in 1984. The current AQIP is a minor revision of the 1984 Plan, submitted in 1994. Given reductions in the ambient carbon monoxide concentrations and the absence of any exceedances of the standards in almost a decade, the State of Idaho is now submitting a Limited Air Quality Maintenance Plan, and requesting redesignation to attainment.

The Northern Ada County Not-Classified Carbon Monoxide Nonattainment Area consists of that portion of Ada County that is north of the Boise baseline (43 degrees North latitude). Areas to the north, east, and south of the Nonattainment Area are either unpopulated or are separated from the Nonattainment Area by natural barriers. Canyon County, to the west of the Nonattainment Area, is populated and has significant sources of carbon monoxide (CO). Although it is in the same airshed, its contributions to carbon monoxide levels in the Ada County Nonattainment Area are considered negligible due to the distance involved and the ready dispersion of carbon monoxide. However, Canyon County does contain a single major point source that is located within the 25-mile radius of Ada County, and is therefore included in the Ada County analysis.

Written comments and data concerning this action are encouraged and will be accepted by the Department until 5:00 P.M., MST November 28, 2001. Comments transmitted by e-mail or facsimile will also be accepted up to the deadline. Written comments will be received by DEQ at the following address:

Gary Reinbold, Air Quality Analyst
Idaho Department of Environmental Quality 1410 North Hilton
Boise, Idaho 83706
Phone: (208) 373-0253 FAX: (208) 373-0154
E-Mail: greinbol@deq.state.id.us

Copies of the Plan are available at the above address, or at the following locations:

DEQ Regional Office	Boise Public Library
1445 North Orchard	715 South Capitol
Boise, ID 83706	Boise, ID 83702 Phone: 373-0550

If you have any questions regarding this notice or the Plan, please contact Matthew Stoll at the DEQ Regional Office.



STATE OF IDAHO

DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton, Boise, ID 83706-1255, (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Director

October 24, 2001

Boise Public Library
715 S. Capitol
Boise, ID 83702

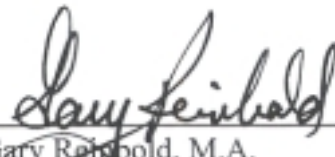
Dear Librarian:

Enclosed are three public comment packages of information concerning the Northern Ada County Carbon Monoxide Limited Maintenance Plan. The draft plan is issued by the Department of Environmental Quality.

Please have the packages available for public review through December 2001. We suggest that the large comment package with appendices be available to be checked out for in-library use only. The other two smaller versions can be made available for overnight checkout.

Thank you for your cooperation and assistance. Please contact me in Boise at (208) 373-0253 if you have any questions.

Sincerely,


Gary Reinbold, M.A.
Air Quality Analyst
State Air Quality Division

GR/fw

Enclosures

cc: COF
PC file



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton, Boise, ID 83706-1255, (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Director

October 24, 2001

Matthew Stoll
Boise Regional Office
1445 N. Orchard
Boise, ID 83706

Dear Mr. Stoll:

Enclosed is a copy of the public comment package concerning the Northern Ada County Carbon Monoxide Limited Maintenance Plan. The comment period will run from October 25 through November 28, 2001. I have listed your office as a location to review the package along with the Boise Public Library.

A hearing has been scheduled for November 27, at 7:00 pm, at the DEQ State Office in Conference Room B.

If you have any questions please contact me at (208) 373-0253.

Thanks for your help.

Sincerely,

A handwritten signature in dark ink, appearing to read "Gary Reinbold", is written over a horizontal line.

Gary Reinbold, M.A.
Air Quality Analyst
State Air Quality Division
Department of Environmental Quality

GR/

Enclosure

cc: COF
PC file



Media Contact

Matt Stoll
DEQ Boise Regional
Office
(208) 373-0550

[View air quality
maintenance plan
\(pdf 394 kb, 47 pages\)](#)

[View appendices](#)

[Submit public
comment via email](#)

[Return to
Previous Page](#)

October 26, 2001

DEQ seeks comment on draft air quality maintenance plan for northern Ada County

BOISE — The Idaho Department of Environment Quality (DEQ) is seeking public comment on a draft air quality maintenance plan for northern Ada County.

DEQ is proposing to designate northern Ada County as an attainment area for carbon monoxide. The draft plan provides documentation required by the U.S. Environmental Protection Agency (EPA) to support attainment status.

Northern Ada County was designated a nonattainment area for carbon monoxide in 1978. As a result of air quality improvements, ambient carbon monoxide concentrations have been reduced and no exceedances of standards have been recorded in nearly a decade.

Copies of the plan, entitled "Northern Ada County Carbon Monoxide Limited Maintenance Plan," are available for review at:

- DEQ's State Office, 1410 N. Hilton;
- DEQ's Boise Regional Office, 1445 N. Orchard;
- Boise Public Library; and
- DEQ's web site in pdf format: [View Air Quality Plan](#) | [View Appendices](#).

Public comment will be accepted through Wednesday, November 28, 2001.

Questions, comments, and requests may be submitted using the email form below or directed to:

Gary Reinbold
DEQ State Office
1410 North Hilton
Boise, ID 83706
Email: greinbol@deq.state.id.us

Public Comment Form

Name:

Email:

Affiliation:

Comments:

The Idaho Statesman

P.O. Box 40, Boise, Idaho 83707-0040

LEGAL PROOF OF PUBLICATION

RECEIVED

OCT 29 2001

DEPARTMENT OF ENVIRONMENTAL QUALITY
STATE A/C PROGRAM

Account #	DT#	Identification	Amount
047653	549841	LEGAL NOTICE	\$109.00
Ordered by:	P.O. #	Rate	Run Dates
GARY REINBOLD		TT	October 25, 2001
IDAHO DEPARTMENT OF ENVIRONMENTAL QUALITY 1410 NORTH HILTON BOISE, IDAHO 83706-1255			Number of Lines 53 X 2
			Affidavit 1
			Legal # 11798

JANICE HILDRETH, being duly sworn, deposes and says: That she is the Principal Clerk of The Idaho Statesman, a daily newspaper printed and published at Boise, Ada County, State of Idaho, and having a general circulation therein, and which said newspaper has been continuously and uninterruptedly published in said County during a period of twelve consecutive months prior to the first publication of the notice, a copy of which is attached hereto: that said notice was published in The Idaho Statesman, in conformity with Section 60-108, Idaho Code, as amended for: ONE

☐ consecutive weekly ☒ single
☐ consecutive daily ☐ odd skip
insertion(s)

beginning with the issue of: OCTOBER 25, 2001
and ending with the issue of: OCTOBER 25, 2001

Janice Hildreth



STATE OF IDAHO	BOISE STATE OFFICE
COUNTY OF ADA	REF-000 # 000-138
On the 25 day of	OCTOBER in the year 2001
before me, a Notary Public, personally appeared before me Janice Hildreth known or identified to me to be the person whose name subscribed to the within instrument, and being by me first duly sworn, declared that the statements therein are true, and acknowledged to me that she executed the same.	
Notary Public for Idaho	<i>Pamela J. Clauch</i>
Residing at: Boise, Idaho	6/20/06
My Commission Expires:	
APPROVED BY	PREPARED BY

LEGAL NOTICE
NOTICE OF INTENT TO AMEND A STATE PLAN REGARDING
CARBON MONOXIDE (CO) R QUALITY IMPROVEMENT IN THE
NORTHERN ADA COUNTY NONATTAINMENT AREA

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The purpose of the hearing and comment period is to receive comments from the public on the Carbon Monoxide Limited Maintenance Plan. This plan was prepared to meet Environmental Protection Agency requirements to support redesignation of the Northern Ada County Non-Classified Carbon Monoxide Nonattainment Area to Attainment status. Northern Ada County, Idaho was designated as a Nonattainment Area for carbon monoxide in 1978. An Air Quality Improvement Plan (AQIP) was submitted to EPA in 1980, and again in 1984. The current AQIP is a minor revision of the 1984 Plan, submitted in 1994. Given reductions in the ambient carbon monoxide concentrations and the absence of any exceedances of the standards in almost a decade, the State of Idaho is now submitting a Limited Air Quality Maintenance Plan, and requesting redesignation to attainment.

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Written comments and data concerning this action are encouraged and will be accepted by the Department until 5:00 P.M., MST November 28, 2001. Comments transmitted by email or facsimile will also be accepted up to the deadline. Written comments will be received by DEQ at the following address:

Gary Reinbold, Air Quality Analyst
Idaho Department of Environmental Quality
1410 North Hillen
Boise, Idaho 83706
Phone: (208) 373-0253
FAX: (208) 373-0154
E-Mail: greinbo@deq.state.id.us

Copies of the Plan are available at the above address, or at the following locations:

DEQ Regional Office 1445 North Orchard Boise, ID 83706 Phone: 373-0550	Boise Public Library 715 South Capitol Boise, ID 83702
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If you have any questions regarding this notice or the Plan, please contact Matthew Stoll at the DEQ Regional Office.

Pub. Oct. 25, 2001 11798

Department of Environmental Quality

• October 26, 2001

• For Immediate Release

NewsRelease

DEQ seeks comment on draft air quality maintenance plan for northern Ada County

MEDIA CONTACT

■ **Matt Stoll**
DEQ Boise
Regional Office
(208) 373-0550

BOISE — The Idaho Department of Environment Quality (DEQ) is seeking public comment on a draft air quality maintenance plan for northern Ada County.

DEQ is proposing to designate northern Ada County as an attainment area for carbon monoxide. The draft plan provides documentation required by the U.S. Environmental Protection Agency (EPA) to support attainment status.

Northern Ada County was designated a nonattainment area for carbon monoxide in 1978. As a result of air quality improvements, ambient carbon monoxide concentrations have been reduced and no exceedances of standards have been recorded in nearly a decade.

Copies of the plan, entitled "Northern Ada County Carbon Monoxide Limited Maintenance Plan," are available for review at:

- DEQ's State Office, 1410 N. Hilton;
- DEQ's Boise Regional Office, 1445 N. Orchard;
- Boise Public Library; and
- DEQ's web site in pdf format at <http://www2.state.id.us/deq/air/air1.htm>.

Public comment will be accepted through Wednesday, November 28, 2001.

Questions, comments, and requests may be directed to:

Gary Reinbold
DEQ State Office
1410 N. Hilton
Boise, ID 83706
Email: greinbol@deq.state.id.us.

End

Appendix H-2.

Summary of Public Comments

Thurs, 10-24-01

GARY -

THANK YOU FOR YOUR "CUSTOMER SERVICE" IN OBTAINING THIS DOCUMENT FOR MY PERUSAL.

PLEASE NOTE CORRECTED) ADDRESS AND PHONE NO. OF ADA COUNTY AIR QUALITY BOARD ON PAGE APPENDIX B-2.

I SUGGEST YOU DOUBLE-CHECK IF THE ADDRESS OF COMPASS IS THE NEW LOCATION (IN MERIDIAN) IF IT IS LISTED ANYWHERE IN THIS DOCUMENT,

KEEP ON KEEPING ON.

Warren Bane
ADA AIR QUALITY BOARD MEMBER

From: Cherie Cole
To: "greinbol@deq.state.id.us"
Date: 10/26/01 1:12 PM
Subject: Air Quality Hearing – Redesignation – November 27, 2001

From a notice received from the DEQ earlier this week:

"Notice is hereby given that the State of Idaho Department of Environmental Quality (DEQ) has scheduled a public comment period from October 25 through November 28, 2001. DEQ will conduct a public hearing on Tuesday, November 27, 2001 at 7:00 p.m. in Conference Room "B" of the DEQ offices at 1410 North Hilton, Boise."

"The purpose of the hearing and comment period is to receive comments from the public on the Carbon Monoxide Limited Maintenance Plan. This plan was prepared to meet Environmental Protection Agency requirements to support redesignation of the Northern Ada County, Not-Classified Carbon Monoxide Nonattainment Area to Attainment status." (my emphasis. I believe this means the removal of existing protections?) "Northern Ada County, Idaho was designated as a Nonattainment Area for carbon monoxide in 1978. An Air Quality Improvement Plan (AQIP) was submitted to EPA in 1980, and again in 1984. The current AQIP is a minor revision of the 1984 Plan, submitted in 1994. Given reductions in the ambient carbon monoxide concentrations and the absence of any exceedances of the standards in almost a decade, the State of Idaho is now submitting a Limited Air Quality Maintenance Plan, and requesting redesignation to attainment." (my emphasis in bold again)

There's more text about the airshed and Canyon County's impacts on Ada County air quality, negligible they say in regard to carbon monoxide. But does have a single major point source of pollution within the 25 miles radius of Ada County, so therefore included in the Ada County analysis. I'm wondering, if I can smell the factories in Nampa right up against the Boise Front foothills, then surely a percentage of the carbon monoxide or other harmful pollutants are indeed a part of the Ada County area of impact by way of an easterly drift?

I do hope DEQ will lift their heads from paper reports and rely on their vision and sense of smell to tell them the air quality is significantly worse than it was in 1994, especially in the oldest parts of town, including Downtown and the Boise River. I'm dreading the long, dark, dirty inversions again this winter, and the traffic fumes are already burningly intense in the mornings. Before they give the development industry the nod with an "Attainment" reclassification, they should think about the next growth boom that is expected soon from the East because of the bombings. Cumulative impacts from uncontrolled development and traffic will occur, and the public process to replace a quality control classification will be too slow to protect the community from the increasing damages. Anyway, thaws my Cassandra view on this reclassification issue. C. Cole

From: Steve Hulme
To: "greinbol@deq.state.id.us"
Date: 10/30/01 1:15 PM
Subject: Northern Ada County Nonattainment

30 October, 2001

I am a lifelong citizen of Ada County (48 years), and am writing to comment on the proposal to revise the status and/or plan for improving air quality in northern Ada County.

As a year-round Boise bicycle commuter and healthy human organism, I depend on an abundant supply of clean air, year 'round. And I've been very grateful that we have had relatively few "bad air days" over the last decade or so. Some of the credit certainly has to be given to those who have developed and implemented a clean air plan. Especially in light of the ever-increasing population in the area.

HOWEVER... I don't feel this is the time to relax those standards, or declare that the victory has been won. We need ongoing diligence. More cars are on the roads in Ada County than ever before.

I feel the fact that I'm a relative "old timer" gives me a perspective that many of the newcomers don't have. The unique climatic conditions of Boise Valley certainly contribute to the occasional bad day. Despite all our efforts to limit pollution in the atmosphere, all we need is the infamous air inversion (usually occurring in winter), when warm air traps the cold, dirty air in the valley, and we could have a week or two of really badly-polluted days. As bad as any big city. So it is certainly in our best interest to do everything possible to limit the amount of pollution that can be trapped in such conditions.

I, for one, am grateful for what the Department of Environmental Quality has done, and urge your continued diligence.

Sincerely,
Steve Hulme
4623 Camas St.
Boise, ID 83705
208/384-6067 - office
208/343-5098 – home

From: Ruth P. Wright
To: "greinbol@deq.state.id.us"
Date: 11/13/01 10:20 AM
Subject: Air Quality

Dear Mr. Reinbold,

I am writing to respond to the notice to amend the State Carbon Monoxide Air Quality.

The year we had 59 days of winter with no sun and air pollution was so high I developed asthma. I was a teacher (I am now retired) and watched as children at recess were coming in with all sorts of respiratory reaction to the foul air. We ended up not going out on days of foul air.

It was a shock in an Idaho that had the reputation for clean water and clean air. Now I have to be very cautious about sleeping with a window open. I like a cool room for sleeping. My neighbors are elderly and heat their home with a wood burning furnace. When it gets cold I have to sleep without fresh air. I realize how important clean air is to the public health.

I am concerned that changes in the state plan will bring lower standards. I would implore you to maintain the highest healthy standards possible throughout the area for our health.

Thank you.
Sincerely,
Ruth P. Wright

From: Candy Odiorne
To: "greinbol@deq.state.id.us"
Date: 11/14/01 9:48 AM
Subject: Draft Air Quality Maintenance Plan for Ada County Public Comments

The air quality in the part of northern Ada County in which I live and through which I commute has deteriorated markedly since we moved to Idaho in 1989. It helps that the subdivision in which I live prohibits the burning of wood stoves, but in areas where there is no such prohibition the smoke hangs in the air, posing a health hazard not only to humans but to animals as well.

At the barn where I board my horse, the animals get what I call "toxic snot syndrome" in the spring and the fall when, in addition to wood smoke all over the valley, there is unrestricted ag burning (containing God knows WHAT kinds of toxic chemicals), not to mention the unrestricted burning of trash and yard debris by residents.

Many horses at the barn where my horse is boarded develop bad coughs (which my vet tried to tell me was "COPD," but which go away when the air clears up) and the skin around their nostrils is BURNED by whatever is in their nasal discharge. I have been around horses all my life and I have NEVER witnessed anything like this.

My husband and I, who never had allergies before moving to Idaho, now can't go anywhere (except out of state!) without Claritin. SW Idaho's dry climate tends to heighten one's sensitivities to allergens, but when exacerbated by the ground-hugging smoke the results are quite unbearable. In addition to the coughing horses, I have NEVER seen as many children with allergies and asthma as I have seen in this area. If I am suffering this much as an adult, it must be murder on infants and small children. But I suppose it is good for business, as the doctors who put drains in the ears of toddlers must be up to THEIR ears in fee income.

I don't understand why Idaho is so reluctant to curb dangerous air emissions, but I don't believe you would get much argument that this unrestrained burning in an area prone to temperature inversions is harmful to living organisms (both two- and four-legged) and I strongly urge you to DO SOMETHING ABOUT IT.

If left unchecked, our air quality is only going to deteriorate further and more rapidly as the population expands, degrading the "quality of life" we brag about so proudly.

When I lived in Denver in the 1960's and 1970's, the county finally prohibited the use of backyard incinerators, although the air quality prior to the burn ban could not be described as anywhere near as bad as it is here. In southwest Idaho, MANY back yards, both corporate and private, are being used as incinerators - and those downwind apparently have no rights whatsoever. We are fed up and angry. I have never been an activist of ANY kind but I am ready to become one over this issue! This is one issue we will be watching closely and with great interest.

From: Jo Kirkpatrick
To: "greinbol@deq.state.id.us"
Date: 11/17/01 3:28 PM
Subject: Public comments on redesignation of attainment rule for CO

Dear DEQ

I write to state that we need redesignation. It would bring the area into attainment of the CO standard, which has not been violated for about 10 years.

The escalation of auto and truck traffic in this area and predicted future escalations are daunting. CO humps up in pockets and does not disperse readily. Where I live, Boise's north end, in winter the CO from commuter traffic on their way to work and on return--which is due to expand exponentially with all the build out to the west--has become much worse than it was when I moved here 7 years ago. Going out for a walk or run in the morning is inadvisable--you can easily choke on the stink of car exhaust. In that exhaust is CO aplenty. Why permit the air quality in this area to just deteriorate endlessly? Soon the inner city--which I consider the north end is part of--will just be a sump of degraded housing and run-down neighborhoods as more middle class people (who are the ones that maintain neighborhood quality) move away to save their kids and or themselves and their senior kinfolk from asthma and toxic air poisoning.

Please do not eliminate the protective non-attainment air quality status. Be civic minded--save the city.

Jo Kirkpatrick
2005 N 17th St
Boise, ID 83702
383-0548

From: Jo Kirkpatrick
To: "greinbol@deq.state.id.us"
Date: 11/21/01 9:58 AM
Subject: Draft Air Quality Maintenance Plan for Ada County Public Comments

I write as a Boisean who lives in the north end to urge that DEQ retain current designation which protects the Boise valley area from CO to some extent. Other types of management would do an even better job, such as getting the legislature to pass a law requiring all Ada/Canyon autos to have emission tests every year!

Living here one block from Harrison Blvd is a nightmare during the commute hours especially in winter months--the stink of auto exhaust is penetrating. CO just clumps, it doesn't disperse easily. A cloud of it hangs over our area every working day.

With the extrapolated buildout to the west and projected thousands of new commuters added to existing traffic, with out the protective non-attainment status this situation could get a hell of a lot worse.

I am an elder, and like many of us I am susceptible to asthma and other respiratory conditions which are continually exacerbated by auto exhaust and air pollution. Preserving air quality in reference to traffic and roads is a MUST for everybody's health.

For once do us citizens a favor: don't allow the current designation to lapse.

Jo Kirkpatrick
2005 N 17th St
Boise 83702
383-0548

From: Cherie Cole
To: "greinbol@deq.state.id.us"
Date: 11/26/01 1:25 PM
Subject: Testimony – Redesignation hearing 11/27/2001

November 26, 2001

Dear Sirs & Madams:

I am writing in opposition to the removal of the protective "Non-attainment" status of our region's air quality. I believe the cumulative impacts of the recent heavy, (46%), valley-wide growth and ongoing growth have not been fully calculated, and will surely cause a local increase in respiratory diseases, deaths, indigence, and other social costs in the future. I think it is foolish to remove existing health protections, especially when it is realistic to believe those risks will remain or return in the very near future.

The length of time and the costs to reinstate this or other protections will be wasted money, at the same time no legal motivation will remain in place for regional planning to reduce the sources of pollution.

While a decrease in some toxins may seem to justify a temporary reclassification, increases in other related toxins and/or particulates are very apparent to those of us living here for longer periods of time. Perhaps our area was not tested as thoroughly as needed for the people here. The quality of air has radically declined around our home near the Boise Front and Downtown in recent years. Drifts and stench that we never experienced before are now happening too often. We can see grey clouds of pollution lying on the street several feet deep, and the new levels of particulate dirt on hundreds of homes in our area has ruined many paint jobs. Surely some of the odorless toxins are carried into or concentrated in places these other pollution drifts go?

I believe several of those requesting the removal of Non-Attainment Status have been motivated by greed and politics. Our environmental protection agencies must be more far-sighted than that, being responsible for the health of generations of entire populations.

For the sake of the people and the future of this valley, please do not eliminate any existing health protecting classifications.

Thank you for your consideration.

Cherie Cole
1221 N. 15th
Boise, Idaho 83702
208-345-3246

From: Lark Corbeil
To: "greinbol@deq.state.id.us"
Date: 11/26/01 3:57 AM
Subject: co2 non-attainment status testimony

Hello,

I'm hoping to be able to attend the meeting tomorrow however wanted to get my comments considered in case I'm unable to make it.

There are some serious flaws in the proposed CO Limited Maintenance Plan that must be addressed satisfactorily in order to move forward with this plan. Most importantly, the old maintenance plan had ridesharing and transit listed as contingency measures to be triggered upon any exceedances. This proposal needs to reinstate them on page 40.

In addition, the data is 6 years old. How relevant and accurate will this be as an indicator for the future? It's not a pleasant word but lives are actually at stake so I'll use it--the limited plan needs to REQUIRE the use of an emissions budget. On the bottom of page 21, the percentages quoted for total reduction credit are more than 100%

Thank you for your devotion to making Treasure Valley air clean and healthy for us and generations to come.

Best regards,

Lark Corbeil
344-2402
2700 Hillway Dr., Boise, Idaho, 83702

From: Matthew Moore
To: "greinbol@deq.state.id.us"
Date: 11/27/01 4:37 PM
Subject: Review and Comments on No. Ada County Limited Maintenance Plan

Importance: High

Gary,

Please include the following comments in the record for the above plan.

- All references to APA or Ada Planning Association should be changed to COMPASS.
- On page 39, under section V.F.1.a. (Conformity. Hot Spot Analysis), the Idaho Transportation Department (ITD) would propose to work cooperatively with IDEQ through Mike Edwards, to update the text in this section to reflect the implementation and use of "Project Level Air Quality Screening, Analysis, and Documentation for Roadway Projects in Idaho (09/04/01) for the purpose of determining transportation project's potential or actual air quality impacts and/or emissions. This guidance document, developed jointly by ITD, IDEQ and the Federal Highway Administration, serves to assure that localized carbon monoxide emissions are addressed. Similarly, it provides the necessary review and analysis of transportation projects for project-level transportation conformity purposes.
- Also on page 39, under section V.F.1.b and c, ITD would respectfully request text be updated to reflect the implementation and use of "Project Level Air Quality Screening, Analysis, and Documentation for Roadway Projects in Idaho (09/04/01) for the purpose of determining transportation project's potential or actual air quality impacts and/or emissions.
- Finally, all references to proposed projects causing increases in CO concentrations exceeding the NAAQS or increases in CO generally, ". . . mitigation measures are required," within V.F.1.a-c should include the caveat "wherever feasible." It is impossible to make a blanket statement that mitigation measures are always available, reasonable or feasible in all cases.

Thank you for the opportunity to comment. Please contact me directly for any clarifications.

Matthew E. "Matt" Moore, M.A.
Senior Transportation Planner
Transportation Planning Division
Idaho Transportation Department
Post Office Box 7129
Boise, ID 83707-1129

208.334.8296-Voice
208.334.4432-Fax

mmoore@itd.state.id.us

<http://www2.state.id.us/itd/planning/reports/cmaq/cmaq.html>

From: Beth Baird, City of Boise
To: "greinbol@deq.state.id.us"
Date: 11/28/01 10:44 AM
Subject: Review and Comments on No. Ada County Limited Maintenance Plan

Below are a few comments related to the updating issues and the airport fire training facility that we have already discussed.

1. Page 25. Last two bullets. More recent ridership figures are available. Kevin Bitner at BUS can provide these.

The 2015 plan was outdated by the 2020 plan. It was completed in 2000 and approved in 2001. Also you may want to indicate that the Treasure Valley Regional Public Transportation Authority is called VIATrans. The Treasure Valley Transit development Plan will be completed in 2002.

2. page 39 Analysis of Regionally Significant The definition of regionally significant has changed since 1999. In October 2001 the ICC voted to change the definition.
3. Appendix A-1 page 25-29 It might be added that the open burning at the airport is for fire fighting training. page 25.

The airport never really had a permit to construct for the fire training facility. It might be better to say--" Limits were established (I'm not sure of the date of the original Director's exemption) that restricted fuel use to 54,300 gallons/yr....". page 28, second the the last sentence in a.

From: Jon Mason, Boise City Councilman
To: "greinbol@deq.state.id.us"
Date: 11/28/01 3:29 PM
Subject:

Hi Gary,

I have attached my comments. Getting through all the appendices and report was painful, and a significant deterrent to public comment.

I think DEQ should delay publishing this to include the 1999 emissions inventory, which appears more professionally prepared.

Thanks for your help.

Jon Mason

November 26, 2001

Gary Reinbold
DEQ State Office
1410 N. Hilton
Boise, Idaho 83706

Subject: Comment on Draft Air Quality Maintenance Plan

Dear Gary Reinbold;

I have concerns on a number of issues raised in this draft:

1. If the 1994 revision of the Air Quality plan is good for 10 years, why is DEQ pushing this Plan through early? More importantly, why is DEQ using 6-year-old emissions inventory when you have just completed a more reliable 1999 emissions inventory?
2. Why is the Air Quality Board being told to not make changes in vehicle emissions testing program when DEQ, without justification, intends to eliminate the transit and rideshare measures in the plan. There is little evidence that DEQ recognizes that VMT is driving CO emissions. CO accumulates during the commute hours, and converting SOV to vanpools and rideshares effectively reduces VMT, and CO emissions.
3. With the dramatic improvement in automotive engine management (combustion control) over the last 30 years, future improvements in automotive emissions will be limited to the replacement of old commuter cars with newer, low polluting vehicles. The Air Quality Board recognizes the importance of the vehicle inspection and maintenance as commute vehicles age.
4. The first 4 control measures listed on pages 21 and 22 appear ineffective as control measures for the future, and DEQ must rely on the next 3 for any future exceedance.
5. The numbers DEQ uses for CO reductions conflict between pages 22 and 26.
6. DEQ provides a weak analysis of the City of Kuna compliance with vehicle emissions testing on page 27. DEQ can determine how many vehicles are registered in the City, which can be confirmed by the Air Quality Board notices sent. AQB also keeps records of those vehicles tested. Where are the results?
7. There is no indication which, if any, of the July 2000 and January 2001 modification will provide an additional 19,073 kg/day reduction in emissions, stated on page 27.
8. In the Contingency Plan on page 36, the use of oxygenated fuels has proven to be a joke in light of modern engine management technology. A better contingency measure recognizes that VMT is driving CO emissions. CO accumulates during the commute hours, and converting SOV to vanpools and rideshares effectively reduces VMT, and CO emissions.

I hope these discrepancies will be addressed.

Sincerely,

Jon Mason
City of Boise
Jmason@cityofboise.org

cc: Stephen E. West, Regional Administrator
Clair Bowman, COMPASS

From: Steven L. Olsen, Representative of Emission Control Station Owners
To: "greinbol@deq.state.id.us"
Date: 11/28/01 4:38 PM
Subject: Draft Air Quality Maintenance Plan for Ada County Public Comments

This letter summarizes my client's opposition to the Idaho Department of Environmental Quality's Limited Maintenance Plan and Request for Re-Designation to Attainment for the Northern Ada County Carbon Monoxide Not-Classified Nonattainment Area (Limited Maintenance Plan).

As indicated in the public hearing last night, I represent several emission testing station owners who test automobiles and trucks pursuant to Ada County's vehicle inspection and maintenance program. My clients do not believe that the Environmental Protection Agency should adopt a plan which will allow Ada County to change its testing program from an annual testing to a biennial (every two years) program. Their opposition to the proposed Limited Maintenance Plan is based on the following factors:

1. The proposed Limited Maintenance Plan notes on page 26 that: "For 1995, a reduction of 32,889 kg per day of carbon monoxide can be attributed to the Ada County vehicle inspection and maintenance program. This equates to 16.2% of total daily carbon monoxide emissions. . . . The vehicle inspection and maintenance program, operated by the Ada County Air Quality Board (AQB), was instituted in 1984. Vehicles registered in Ada County are required to pass the emissions test or face revocation of registration. Subsequent to the implementation of the vehicle inspection and maintenance program, exceedances of the eight-hour Carbon Monoxide NAAQS dropped steadily, from 15 in 1983, to zero only four years later.

The Limited Maintenance Plan acknowledges that the Ada County Vehicle and Inspection Program has had a very positive impact on carbon monoxide emissions in Ada County. Since 1984, that Plan has required an annual testing of all vehicles. If the EPA allows Idaho to adopt a program which allows biennial testing rather than annual testing, the air quality in Ada County will suffer.

The EPA should require Idaho to continue with its program of annual testing because such a program would be more protective of air quality, a fact acknowledged by the Idaho Department of Environmental Quality in its proposed Limited Maintenance Plan. On page 5 of Appendix B-1 attached to the Limited Maintenance Plan, it is noted that: "Moving from annual to biennial (every other year) testing was planned to begin in July of 2000, and the Emissions Inventory reflects this change. The Mobile 5b model used to estimate emissions interprets this change to result in slightly increased carbon monoxide emissions, as vehicles with excessive emissions would potentially not be repaired as often. However, the implementation of this change is still under discussion. Since remaining an annual test is actually more protective of air quality, no changes will be made to emissions projections or planning.

As this excerpt suggests, no changes should be made to the annual program for emissions testing currently in effect in the State of Idaho.

In the report presented in support of the Limited Maintenance Plan, it is noted that: "The EPA assumes that levels will not increase past the health-based standards, given that existing control measures remain in effect." Again, existing control measures in effect, include an annual, not a biennial testing of motor vehicles in Ada County, Idaho. This control measure should remain in effect so that the citizens of Ada County will have a better standard of air quality than simply the minimum requirements imposed by the EPA.

Submitted this 28th day of November, 2001.

Steven L. Olsen



Community Planning Association of Southwest Idaho

November 28, 2001

Matthew Stoll, Regional Airshed Manager
Idaho Department of Environmental Quality
1445 N. Orchard
Boise, Idaho 83706

Dear Matt:

I would like to express COMPASS' Board support for the "Limited Maintenance Plan and Request for Re-Designation to Attainment for the Northern Ada County Not-Classified Nonattainment Area." COMPASS is committed to improving air quality in the Treasure Valley and we believe this plan is a significant step toward that goal.

COMPASS is the lead transportation planning agency for the current non-attainment area and, as such agrees to continue to oversee the Interagency Consultation Committee specified in the Plan. Furthermore, COMPASS agrees to perform all conformity analyses contemplated by the Plan.

In short, the COMPASS Board endorsed this Limited Maintenance Plan to ensure that Carbon Monoxide levels remain below the National Ambient Air Quality Standards or limits. We urge its immediate submittal to the Environmental Protection Agency and their prompt approval.

Sincerely,

Clair M. Bowman
Executive Director

pc: 651.01
COMPASS Board of Directors
JR:dw T:\800envplnpro\Air Quality\co-mainpln\Support Letter for Plan.doc

Appendix H-3.

Transcript of Public Hearing

DEPARTMENT OF ENVIRONMENTAL QUALITY

BOISE REGIONAL OFFICE

Carbon Monoxide Limited)
)
Maintenance Plan for)
)
Northern Ada County)
)

LARRY F. WEEKS
Hearing Officer

PUBLIC COMMENTS

NOVEMBER 27, 2001

7:00 P.M.

BOISE, IDAHO

BURNHAM, HABEL & ASSOCIATES, INC.

Certified Shorthand Reporters

ORIGINAL

Reported By

Post Office Box 835
Boise, Idaho 83701

Robyn Dane,
CSR

(208) 345-5700 • FAX 345-6374 • 1-800-867-5701

BE IT REMEMBERED that the Public Comment Hearing for the Carbon Monoxide Limited Maintenance Plan was held at the offices of the Department of Environmental Quality, Boise Regional Office, located at 1410 Hilton Street, Boise, Idaho, before Robyn Dane, a Certified Shorthand Reporter and Notary Public in and for the County of Ada, State of Idaho, on Wednesday, the 27th day of November, 2001, commencing at the hour of 7:00 p.m. in the above-entitled matter.

A P P E A R A N C E S

For DEQ: Karin Hendrickson
Air Quality Program Development Specialist
1445 North Orchard
Boise, Idaho 83706

I N D E X

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1 P R O C E E D I N G S

2
3 INTRODUCTORY STATEMENT

4 HEARING OFFICER: Let the record show that I
5 am Larry Weeks, the designated hearing officer for the
6 Department of Environmental Quality, Boise Regional
7 Office. It is seven o'clock p.m. on the 27th day of
8 November 2001.

9 We are in Conference Room B of the Department
10 of Environmental Quality in Boise, Idaho. This is the
11 time and place set to receive oral comments on the
12 revisions to the state implementation plan. The
13 revision we will be dealing with is with a carbon
14 monoxide limited maintenance plan for northern Ada
15 County.

16 For the audience's information, the state
17 implementation plan is a plan required by federal law to
18 be developed and implemented by a state to meet national
19 ambient air quality standards.

20 The purpose of this proceeding is to gather
21 the facts, views, or arguments from all interested
22 persons relative to the revisions so that they may
23 receive consideration by the department.

24 I will accept written statements or documents
25 at the hearing this evening, if relevant and signed by

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1 the persons presenting them. The materials will be
2 included as exhibits in the record, which will be
3 transmitted to the Department of Environmental Quality
4 following the close of the public comment period.

5 Let the record show that an affidavit is on
6 file regarding publication of the legal notice of the
7 opportunity for public comment at least 30 days prior to
8 the close of the scheduled comment period as specified
9 in Title 40, Code of Federal regulations, Part
10 51.102(d).

11 Such publication was made in the Idaho
12 Statesman on October 25, 2001. Such publication
13 included notice of this public hearing. This
14 publication was timely made, and other necessary notice
15 requirements have been met.

16 As an informal proceeding there is no right to
17 cross-examine a person offering a comment, nor is there
18 a right to counsel or subpoena. No objections or
19 procedures of a technically legal nature will be
20 received. As the hearing officer I am the sole
21 regulator of the course of the presentations, including
22 but not limited to a determination that the comments are
23 outside the scope of the rules or that comments are
24 unduly repetitious.

25 I am not here to answer questions or to

1 explain any part of the proposed plan, although I myself
2 might ask questions to further explore or amplify the
3 information presented.

4 All those interested parties attending this
5 proceeding are asked to sign in on the roster by the
6 entrance indicating a desire, if any, to make an oral
7 presentation. I ask that you try to limit your comments
8 to five minutes.

9 After a brief statement by the department
10 representative, which will summarize the information
11 upon which the proposed action is based, each person
12 will be given an opportunity to speak at least once
13 prior to any person being heard a second time.

14 I will remind you that this hearing is on a
15 proposed revision and that only comments concerning that
16 topic may be considered. At this time the department's
17 statement will be read into the record followed by the
18 oral presentations.

19

20 STATEMENT BY THE DIVISION OF ENVIRONMENTAL QUALITY

21

22 MS. HENDRICKSON: My name is Karin
23 Hendrickson. I'm an air quality analyst for the Boise
24 Regional Office, the Department of Environmental
25 Quality. My testimony will briefly outline the actions

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1 leading to this hearing, the reasons for the development
2 of the carbon monoxide maintenance plan, and how the
3 department will respond as to the comments received at
4 this hearing.

5 The background for the plan. Given the
6 reductions in the ambient carbon monoxide concentration
7 and the absence of any exceedances of the standards in
8 almost a decade, the state of Idaho intends to petition
9 the Federal Environmental Protection Agency for
10 redesignation to attainment.

11 DEQ has developed a limited air quality
12 maintenance plan which outlines the steps to be taken to
13 be sure that carbon monoxide levels stay below the
14 national ambient air quality standard or limits.

15 Northern Ada County was designated as a
16 nonattainment area for carbon monoxide in 1978 based on
17 measured violations of the national ambient air quality
18 standards. An air quality improvement plan was
19 submitted to EPA in 1980 and again in 1984. The
20 currently applicable air quality improvement plan
21 submitted in 1994 is a minor revision of the 1984 plan.

22 The northern Ada County carbon monoxide
23 nonattainment area consists of that portion of Ada
24 County that is north of the Boise baseline, 43 degrees
25 north latitude. Contributions to carbon monoxide levels

1 in the Ada County nonattainment area from outside the
2 nonattainment area are considered negligible due to the
3 ready dispersion of carbon monoxide.

4 In addition, areas to the north, east and
5 south of the nonattainment area are either separated
6 from the nonattainment area by natural barriers to air
7 movement or unpopulated, with few sources of carbon
8 monoxide.

9 The Idaho Department of Environmental Quality
10 operates a permanent carbon monoxide gas analyzer in
11 downtown Boise. Saturation studies have shown that this
12 site consistently records the highest carbon monoxide
13 concentrations in the nonattainment area.

14 The steady downward trend in carbon monoxide
15 concentrations has been measured in Ada County. Only
16 one exceedence of the eight-hour national ambient
17 air quality standard has been recorded since 1986. This
18 was recorded in January of 1991.

19 Northern Ada County qualifies to submit a
20 limited maintenance plan because levels in recent
21 years have been much lower than the standards. The
22 design value -- the second highest eight-hour carbon
23 monoxide concentration measured in eight consecutive
24 quarters based on the years 1995 and 1996 -- is below
25 7.65 parts per million, or 85 percent of the standard.

1 In a limited maintenance plan, the submitting
2 agency is not required to conduct the rigorous and
3 costly modeling work or to develop an emissions budget.

4 The EPA assumes that levels will not increase
5 past the health-based standards, given that existing
6 control measures remain in effect. The EPA also
7 requires a contingency plan that outlines additional
8 measures that will be taken if levels do begin to rise
9 to further ensure the protection of the standards.

10 The downward trend in carbon monoxide levels
11 in Ada County cannot be attributed to economic
12 downturns. The area has experienced tremendous growth,
13 resulting in an increased number of emission sources.

14 The downward trend in carbon monoxide levels
15 in Ada County cannot be attributed to exceptional
16 weather conditions either. The extended temperature
17 inversions and stagnant air masses that are important in
18 the buildup of particulate matter air pollution have
19 decreased in the last decade; however these conditions
20 do not play the same role in carbon monoxide
21 accumulation.

22 The area has seen its highest carbon monoxide
23 levels when rush-hour traffic coincided with short-term
24 lower level temperature inversions. The frequency of
25 these short-term lower level temperature inversions have

1 actually increased in recent years.

2 Contents of the maintenance plan. The
3 maintenance plan must include an emissions inventory to
4 quantify the amount of carbon monoxide being emitted in
5 this area, a commitment to continue monitoring carbon
6 monoxide levels, and assurance that existing control
7 measures will remain in effect.

8 The control measures in this plan include the
9 vehicle emissions testing program. Transit and
10 ride-share measures were included in previous plans but
11 have been offset by improvements to the vehicle
12 emissions testing program for this effort.

13 While transit and ride-share unquestionably
14 help to reduce carbon monoxide emissions, they are
15 essentially unenforceable and are therefore
16 inappropriate for use as identified control measures.
17 The plan must also include details on how the progress
18 of the maintenance plan will be tracked.

19 For this plan, a comprehensive review of the
20 assumptions, demographic data, and estimated vehicle
21 miles traveled used to develop the emissions inventory
22 will be conducted by 2005 to determine whether the
23 assumptions are still reasonable and descriptive of
24 actual conditions.

25 If actual growth of carbon monoxide emissions

1 exceeds projected growth by 20 percent or more, or if
2 relative contributions from source categories in
3 comparison with other source categories change by
4 percent or more, an update to the emissions inventory
5 will be prepared.

6 Based on this data, DEQ will work with EPA
7 Region 10 to determine if a revision of the maintenance
8 plan is necessary. The maintenance plan must also
9 include contingency measures that will be activated if
10 carbon monoxide levels reach a specified trigger. For
11 this plan, triggers will be activated if eight-hour
12 average concentrations of eight parts per million are
13 measured on four or more days within a single winter
14 season or if an exceedence of the national ambient air
15 quality standards -- set in an eight-hour average of
16 nine parts per million -- occurs.

17 If contingency measures are triggered, all
18 motor vehicle fuels dispensed within the nonattainment
19 area will be required to contain a minimum of 10 percent
20 ethanol. This plan also provides the option to
21 negotiate a different measure with EPA should another,
22 more effective option be identified.

23 With respect to demonstration of compliance
24 with transportation conformity requirements, a
25 constraining emissions budget is not required under a

1 limited maintenance plan; however, COMPASS, the local
2 metropolitan planning organization responsible for
3 transportation planning and conformity determinations,
4 has agreed to continues the use of build/no build
5 analysis for planning purposes.

6 In addition, COMPASS or the construction
7 project sponsor must also conduct analyses of hot spots
8 and regionally significant projects.

9 Comment and review. Once the public comment
10 period closes on November 28 at five o'clock p.m.,
11 Mountain Standard Time, the department will respond to
12 all comments in a public comment response package. This
13 package will consist of the transcript from this
14 hearing, the hearing officer's certification, all
15 written public comments received during the comment
16 period, and responses to those comments.

17 The response package will be made available to
18 the public at the Boise Public Library and the
19 Department of Environmental Quality, Boise Regional
20 Office. The department will review and respond to all
21 comments received during the public review process.

22 The department will then determine whether or
23 not to submit the plan to the EPA. If a determination
24 is made to submit the plan, it will be finalized
25 and recommended for inclusion in the state

1 implementation plan. It will then be submitted to the
2 Environmental Protection Agency for their approval.

3 If this document receives EPA approval, the
4 area will then be redesignated to a maintenance area for
5 carbon monoxide, and the maintenance plan will become
6 the applicable air quality plan for the area.

7 If the EPA does not approve of the maintenance
8 plan, the department will revise the maintenance plan to
9 address identified deficiencies. The plan would then
10 undergo the public review process again before being
11 submitted to the EPA.

12 The department is very interested in hearing
13 comments about this carbon monoxide maintenance plan.
14 No one should feel that they must have detailed
15 technical knowledge of a document in order to provide
16 useful comments. The department takes public input very
17 seriously, and your comments are appreciated.

18 We are constrained in this hearing to consider
19 only comments relevant to this carbon monoxide
20 maintenance plan itself.

21 HEARING OFFICER: Thank you. To begin, I will
22 call upon persons in order who indicated on the roster a
23 wish to be heard. Since these proceedings are being
24 recorded, I ask that those who wish to make oral
25 presentations come forward, next to the court reporter,

1 preceding their comments with their name.

2 And please spell your last name. And first on

3 the list would be Sharon Ullman.

4

5 STATEMENT BY SHARON ULLMAN

6

7 MS. ULMANN: My name is Sharon Ullman. I am
8 an Ada County commissioner, and I am the commission's
9 representative on the Air Quality Board. I'm not here
10 representing the Air Quality Board tonight.

11 The views I express are my own. I am
12 concerned about our ability to locally control our air
13 quality program, and because of that concern want to see
14 a plan adopted as quickly as possible by the EPA that
15 will allow us to make revisions to our air quality
16 program, our emissions testing program, that will still
17 provide for clean air at the lowest cost and least
18 inconvenience to the public.

19 Specifically we've talked on the Air Quality
20 Board about going to biannual testing and possibly
21 ultimately exempting vehicles for the first three to
22 five years because they don't seem to contribute a
23 significant degree to our air quality problem.

24 It's my understanding that if this plan -- or
25 when this plan is adopted by EPA that we can go to

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1 biannual testing.

2 We've also talked about the possibility of
3 vehicles that fail their emissions test in any given
4 year being required to test again the following year
5 because we do have a very high level of vehicles that
6 fail one year and then are brought into compliance.
7 There's a high level of them failing the following year.
8 But we also have a lot of vehicles that pass year after
9 year after year, and so we have discussed on the Air
10 Quality Board the issue of not inconveniencing people
11 every year if there doesn't seem to be good reason.

12 We've also talked about requiring vehicles
13 before they are transferred -- title is transferred from
14 a dealer, whether they're new or used vehicles, to
15 require them to be tested before that title is
16 transferred because we have vehicles being brought in
17 from out of state with either altered emissions control
18 equipment or no emissions control equipment, and that we
19 think that we could save people a lot of heartache and
20 cost by requiring testing before that title is
21 transferred.

22 HEARING OFFICER: Thank you, commissioner. Do
23 you have any written documents you want to submit?

24 MS. ULLMAN: No, I do not.

25 HEARING OFFICER: Thank you. Dale Tankersley.

1 STATEMENT BY DALE TANKERSLEY

2

3 MR. TANKERSLEY: I'm Dale Tankersley,
4 T-a-n-k-e-r-s-l-e-y. I live in Boise. I have for 35
5 years. My main concern here is the issue of mandating
6 ethanol into gasoline.

7 Now, our economic slump caused me to do my
8 patriotic and civic duty, so I went out and bought me a
9 \$25,000 automobile, which I'm sure the sales tax put a
10 little bit in governor Dirk's tin cup, some money in the
11 profit of the dealer, probably some money in the profit
12 of the manufacturer.

13 And here's the owner's manual. And on page
14 190 of this brand-new car it says, "Do not use fuel
15 containing methanol. It can damage critical fuel system
16 components."

17 And then over on page 195 -- and we're all
18 here in Idaho, we're interested in this because we know
19 we've been gouged on gasoline prices. But it says,
20 "Using fuel blended with alcohol may lower fuel
21 economy."

22 So unless somebody wants to indemnify me that
23 I won't destroy that engine or the components, I think
24 it's sad. And I'm sure there's probably not only
25 hundreds but perhaps thousands of these automobiles

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1 running around here that's not supposed to use that
2 stuff.

3 And besides that -- well, I better not say it.
4 Thank you.

5 MR. BEAN: My name is Warren. Last name is
6 Bean, B-e-a-n.

7 HEARING OFFICER: Sorry. Go ahead.

8 MR. BEAN: I was just curious. The
9 manufacturer of the automobile that has this restriction
10 on it?

11 MR. TANKERSLEY: It's Ford Motor Company.

12 MR. BEAN: Interesting. Thank you, sir.

13 HEARING OFFICER: Dale Keys?
14

15 STATEMENT BY DALE KEYS
16

17 MR. KEYS: My name is Dale Keys, and this is
18 the first time I've ever testified at one of these
19 hearings, and I'm just getting over a major bronchial
20 infection, which has nothing to do with air quality, I
21 don't think, but -- so that's just coincidence.

22 I wish I had had something written out here,
23 but I just have notes jotted down because I was late
24 getting into this game. I have -- for the last few
25 years I have had -- I have questioned why it is that

1 Boise residents -- that Ada County residents have to
2 repeatedly have their emissions tested on their vehicles
3 while tens of thousands of cars are commuting in and out
4 of Boise every day.

5 I think that is the one thing that gets
6 everybody's nose out of joint in the city. I have a
7 truck sitting in my driveway that I've driven 300 miles
8 in the last year. I just use it when I need a truck.
9 The car that I drive to work gets 32 miles to the
10 gallon. I have to keep the emissions tested on that
11 pickup truck, even though I drive it about two or three
12 days a month.

13 And last year it failed for the first time.
14 When I took that truck in to have it tested, that's when
15 I found out I had to spend \$150 towards improving the
16 emissions on it. I spent the \$150. The truck polluted
17 more after the money was spent on it, yet it was legal
18 to drive it then. And now a year has passed and it's
19 time to get it tested again.

20 I'm seriously considering whether it's worth
21 wasting another \$150 on something that I know isn't
22 going to work, and just let the registration run out on
23 it because the fine for no registration is only half of
24 what I would spend to get it up to snuff emissions wise.
25 These things cause the public to really be cynical about

1 these regulations.

2 So the Canyon County commuters outside of
3 Boise commuters, that's my first comment. The other
4 thing is I'm concerned about the way we keep licensing
5 drive-through facilities in this town. Idling cars are
6 causing more pollution than cars that are moving down
7 the road, for obvious reasons.

8 The next thing that I'm concerned about is our
9 traffic lights don't seem to have any rhyme or reason to
10 them. They just -- the cars keep -- again idling cars
11 are causing pollution, increased pollution, in these
12 concentrated areas.

13 The next thing on my list has been a problem
14 for me in the last two years, and that's the increase in
15 the amount of gasoline-powered leaf blowers that are
16 being used in this city. I call them dirt blowers. If
17 we only used these in October and November to rake
18 leaves, that would be fine.

19 They're used 12 months out of the year to blow
20 dirt, and this actually came to my attention one day
21 when I looked out the window and saw the landscape guy
22 coming by my convertible and blew dirt all over my
23 convertible. I came out. I had a cigarette butt on my
24 dashboard that he'd blown up from the pavement. This is
25 considered cleaning.

1 We keep blowing this dirt around in our city.
2 It settles back to the ground. Hyde Park is another
3 place. Every Sunday morning right across the street
4 from where I have coffee, here comes the dirt blower.
5 When he's done there's a fog of dirt in the middle of
6 the street. Also that is blowing garbage into the river
7 runoff systems, so it's illegal to throw garbage off
8 the bridge in the Boise River, but you can blow it into
9 the storm drain legally.

10 And so that's another point of contention I
11 have.

12 Lastly I am currently fighting with the Ada
13 County Highway District which wants me to cut down my 30
14 year-old shade tree in my front yard because it's
15 interfering with the sidewalk. They don't want to take
16 the sidewalk a foot and a half to the left and go around
17 my tree because they -- well, they just keep fighting me
18 to cut the tree down, and so that it won't buckle the
19 sidewalk anymore.

20 And here we have a tree in the City of Trees.
21 One of the best pollution control things that we have in
22 nature that we know of is a tree. And yet here I am
23 fighting. On the one hand, I'm getting -- I'm trying to
24 get my truck emissions into -- up to code while the Ada
25 County Highway District, to bring my sidewalk up to

1 code, wants to cut down a 30 year-old shade tree out of
2 my front yard.

3 The insanity of that -- I don't even have to
4 go into the insanity of that. Anybody with any common
5 sense at all can look at that and say that's total
6 nonsense. And that was pretty disorganized and
7 disjointed, but that's all I have to say.

8 HEARING OFFICER: Thank you, Mr. Keys.

9 MR. KEYS: Thank you.

10 HEARING OFFICER: Mr. Richardson, have you
11 decided whether you want to testify?

12 MR. RICHARDSON: Yes.

13 HEARING OFFICER: Would you state your name
14 for the record, please?

15

16 STATEMENT BY GARY RICHARDSON

17

18 MR. RICHARDSON: My name is Gary Richardson,
19 R-i-c-h-a-r-d-s-o-n. I live in Boise. I'm the
20 secretary of the Idaho Clean Air Force, but I'm really
21 not representing them here tonight, and I haven't really
22 studied this in great detail, but I have a few comments
23 there.

24 They're kind of questions, but I think they're
25 issues that need to be addressed in the plan document

1 before it goes final. One thing is the saturation
2 studies that are referenced. It's my understanding that
3 the most recent saturation studies were conducted in
4 1996, and it's my feeling that it's now five years
5 later.

6 We've had unprecented growth in that five-year
7 traffic patterns have changed, and it would do for the
8 appropriate bodies to conduct additional saturation
9 studies just to ensure that the monitoring is optimal,
10 staying with the downtown monitor where it is.

11 I did a cursory look at traffic counts on some
12 of the major streets in Boise today, and it seems to me
13 you've got intersections outside of the downtown area
14 that potentially could be hot spots that you may not be
15 catching if your data is just as recent as '96.

16 Addressing a couple -- several other points,
17 on page 24 of the document where you discuss
18 transportation control measures, the statement is made
19 -- this is in Section 2, second sentence: "However, the
20 current SIP, the 1994 minor revision, includes several
21 transit and ride-share measures that are essentially
22 unobtainable, impractical, or unenforceable."

23 I was trying to track it down today, and I
24 will try to get it into the record before the comment
25 period closes tomorrow, but there's been a recent

1 decision -- I think it was in a federal district court
2 or possibly appeals court -- dealing with the Bay Area
3 where their contentions that the traffic -- excuse me --
4 transit measures in their plan were unobtainable and, I
5 believe, impractical. Made no difference whatsoever.

6 I believe in that case they were exceeding the
7 standards, but I just don't think that's a very good
8 excuse for why you should exclude transit and ride-share
9 provisions from the plan, which is what they're proposing
10 to do. I think you need some stronger reasons.

11 Then turning to page 27, where at the bottom
12 of that page there's a six-bullet item, and it reads,
13 "Additional modifications made between July 2000 and
14 January 2001 have made the program even more effective.
15 Changes included lowering the CO cut point or allowable
16 percentage."

17 That's the first bullet point. Then it says,
18 "Adding a standard for hydrocarbon emissions." I see no
19 way that that would have any bearing on CO. The next
20 one is modifying the waiver policy so that initial
21 waivers can be issued only after at least 150 hours of
22 repair work has been done on the vehicle.

23 The next one is adding diesel vehicles to the
24 list of vehicles required to pass an emissions test. I
25 question whether that has an appreciable CO effect, but

1 I don't know. I'm not technically expert enough to tell
2 you, but I just wonder if this -- why this list of
3 things was given when they're not all necessarily CO
4 related.

5 Expanding the test from idle only to two-speed
6 tests conducted at both idle and 2,500 RPMs. I doubt
7 that that has any bearing on the CO improvements because
8 your idle tests would be the one that would be a
9 critical -- would give you the critical information for
10 the CO.

11 And then eliminating the test and repair
12 option for test stations and their owners. Stations are
13 no longer permitted to offer repair services to check
14 emissions. I have absolutely no idea how that could
15 have any bearing on CO emissions. And then the final
16 statement on that page is, these improvements not
17 required by the SIP. SIP will result in an additional
18 19,073 kilograms per day reduction in emissions over the
19 previous program.

20 I assume that means but it does not make clear
21 that you're talking about CO emissions. I question
22 whether you could get that kind of gain from that list.
23 But if you can, I think it behooves you to make it
24 clearer just exactly which of those measures are going
25 to get you the 19,000 kilograms a day in emission

1 reductions from CO.

2 I think this is a final point, and it bears on
3 what Commissioner Ullman was touching on, and that it
4 seems that because you're basing this whole plan on a
5 1994 plan and just trying to use it to -- so that you
6 don't have to do a new plan, you're really depending on
7 some fairly outmoded technologies.

8 The vehicle emission testing technology that
9 we're using now, basically it's my understanding, will
10 be essentially obsolete within a very few years. Most
11 of the new cars are coming through with computerized
12 technology that would obviate the need to do the kind of
13 tailpipe testing you're doing.

14 But yet you're bidding this whole plan -- it
15 seems your major reductions are from vehicle emission
16 testing and improved federal standards, most of which
17 have been accomplished in both of those cases. And so I
18 guess an essential logical shortcoming I see in the plan
19 is that you're trying to project forward additional CO
20 reductions from technologies which have basically been
21 exhausted.

22 I don't think you're going to get any greater
23 improvement in the federal emissions standards that are
24 going to get you greater CO savings. And I don't think
25 you're going to get any appreciable improvement from

1 additional emissions testing technology, so I just
2 wonder if you really shouldn't do a little improvement
3 to the planning document rather than just ride it on.

4 I know the thinking is that's all you have to
5 do, but it seems to me we ought to do a little bit more
6 than just what we have to do when this place is growing
7 so quickly and we know that CO is likely to reassert
8 itself as a problem here.

9 It's already getting to be a substantial
10 problem in Canyon County. I can't believe that with the
11 growth continuing in this area that it's not going to
12 be, and to just let it ride for ten years on a hope and
13 a wish, which is what this essentially does, I think is
14 shortsighted. And I guess with that I'll conclude.
15 Thank you.

16 HEARING OFFICER: Thank you, Mr. Richardson.
17 Barbara Beehner, is it? You haven't indicated whether
18 there was any wish to comment.

19 MS. BEEHNER-KANE: B-e-e-h-n-e-r hyphen
20 K-a-n-e. No.

21 HEARING OFFICER: Dan -- is it Buerstetts?
22

23 STATEMENT BY DAN BUERSTETTS
24

25 MR. BUERSTETTS: Buerstetts. Last name is

1 B-u-e-r-s-t-e-t-t-s. I'm a relative newcomer to the
2 area myself, and my family moved here a year ago from
3 Texas. And the reason I'm here tonight is because I'm
4 overall pretty shocked at what I experienced.

5 I thought it was the forest fires that made
6 this place look dirty and it would dissipate after the
7 forest fires were put out, but then I saw there's dust
8 particulate. There's effluent from the sugar plant
9 factory that blows this way. There's geography working
10 against us creating inversion and trapping all the
11 pollutants derived from automobiles and fireplaces and
12 what not.

13 And it looks like it's going to plague us year
14 round, and I'm extremely disappointed. I'm making the
15 assumption that this is just one aspect of the pollution
16 that the DEQ is addressing. My hopes are that this is
17 just one aspect because certainly there are other
18 substantial impacts on the environment that need to be
19 monitored and controlled and don't -- to my little bit
20 of research that I've don't appear to have been
21 monitored.

22 But as far as this issue, the carbon monoxide,
23 Correct me if I'm wrong, but I've been told that about
24 10 percent of the cars in the area are not subject to
25 the local testing. The vast majority of the people in

1 Ada County are using their cars here, but the -- another
2 seemingly substantial percentage are coming from outside
3 the area and are not subject to the testing.

4 It may be an even more substantial factor than
5 just the small percentage that's coming from outside
6 because those tend to be the most noticeable polluting
7 vehicles. They're the ones with the blue exhaust coming
8 out the back of the tailpipe, so they're probably
9 equivalent to about 20, 30, 40 emissions-meeting
10 vehicles. So that's something of concern to me.

11 I also own a late model vehicle. It's a small
12 four cylinder BMW. It specifically states in my owner's
13 manual precisely the same verbiage that the previous
14 gentleman who spoke said; it will affect the -- to a
15 layperson's interpretation it can affect me also with
16 the vehicle's input and outputs. The vehicles -- if you
17 use ethanol, and it will also just damage the function
18 of the machine.

19 So I am very concerned about having to
20 possibly use ethanol and incur tremendous expenses to
21 get my vehicle running properly again and being up
22 against the wall. If that proves to be the only
23 gasoline available for a period of time, I'll
24 effectively loss my automobile or the use of my
25 automobile until we lower emission standards and are

1 able to stop using the ethanol supplemented gasoline.

2 As far as where to monitor it, certainly
3 downtown gets crowded. Lately there have been a lot of
4 people at the mall. And it astounds me the mall is
5 always busy. That may be a place to set up measurements
6 as well. Apparently CO-2 and unbound hydrocarbons,
7 somebody insinuated that those two don't necessarily go
8 hand in hand. I would think they do.

9 But I don't know what effect lighter fluid
10 has, but in the summertime there's a heck of a lot of
11 lighter fluid. It's a highly volatile, organic
12 compound. I don't know if that -- TVOC is not carbon
13 monoxide. You have to have combustion to get that, but
14 if a ban on that would help lower it, obviously we're
15 searching for ways to lower it economically by
16 disallowing the sales of some products that we feel
17 create more carbon monoxide than others.

18 That may be an approach. I don't know if
19 diesels are omitted from the tailpipe testing standards.
20 It seems odd to me, but I've yet to be educated on that
21 aspect of it. And that's all I have to say.

22 HEARING OFFICER: Thank you sir. Thank you.
23 Jim Glancey.

24 ///

25 ///

STATEMENT BY JIM GLANCEY

MR. GLANCEY: Jim Glancey, G-l-a-n-c-e-y, and I sell and manufacture ethanol. I'd like to correct both of the two gentlemen who have spoken. Ethanol is not methanol. In the book that you read, you stated methanol. Methanol is a toxic. It's corrosive. In fact, if you drink it the anecdote for it is to take ethanol.

But the main thing is, we've gone through this with the motor vehicle manufacturers for the last years. And everything since 1988 will state that a 10 percent blend of ethanol is acceptable, is warranted in all vehicles manufactured in the United States. It will not harm your vehicle. It won't harm the BMW, whether it was manufactured here or not, and it's warranted to that effect.

The confusion's occurred in the past with People confusing methanol and other additives with Ethanol. And the fact that we've sold it here for years and over 10 percent of all the gasoline in the United States at the present time is using ethanol, there's over two billion gallons of ethanol sold in the United States last year.

And if you only use it on a 10 percent blend,

1 you can see where that's 20 billion gallons of fuel.
2 And if there was a problem with the vehicles, I'll
3 guarantee you, you wouldn't be using it. The automobile
4 manufacturers are required in their emissions testing,
5 and if their vehicle life -- to go 50 to 100,000 miles,
6 and if there was any harm to the vehicle it would not be
7 used.

8 And there's been actually trillions of miles
9 run with it right now. I really just want to correct
10 that portion of it. I always -- and as I said, I've
11 been pitching this for the last almost 20 years now, and
12 it's ethanol we run even on 100 percent blends. We run
13 a race car out at the drag strip. There's Payette
14 police cars that run on it in a 100 percent blend, and
15 these are Chevelles.

16 It has been very nominal modifications to it
17 and had no problem. The 10 percent blend of ethanol in
18 the last couple years has been used by all the emergency
19 vehicles in the City of Boise, including your police
20 cars and your emergency vehicles, fire engines where
21 they have gas if they're not using diesels, just because
22 of the contracts, practical arrangements.

23 On the BMW side, I have a friend who's run
24 over 200,000 miles on a small one. I'd be happy to put
25 you in touch with him. The thing I look at is that even

1 with the way this SIP is proposed, the ethanol wouldn't
2 come into play until after 2005, and that's if we have
3 violations.

4 And then after you have the violation it takes
5 another two years before you'd come back and say you
6 probably should mandate using the ethanol. My question
7 is, why aren't we being proactive if we know we're going
8 to be having a problem with carbon monoxide and we are
9 -- and carbon monoxide is a poison; it's as poisonous
10 and more so than the lead that the oil companies put in
11 the gasoline for years.

12 And when they were told to take it out in
13 1976, they took 20 years before it finally all came out.
14 It wasn't until '96 we finally had all the lead out of
15 the gasoline.

16 I would like to see a more aggressive program.
17 I think part of the aggressive program would be that we
18 encompass a larger area. I think the comment has been
19 made by the gentleman and the growth in Canyon County.
20 I was looking at the news the other night, and we're
21 talking about another growth in Kuna, you know. 320
22 residents is being built in one subdivision.

23 I've lived here 26 years. I like clean air.
24 I spent a lot of time developing and working in this
25 area, and the ethanol is a product that's made from

1 agricultural products. There's a small plant in Wyoming
2 where we manufacture it from corn. There are two plants
3 here in Idaho where they manufacture it from potatoes.

4 There's some plants being proposed here in
5 Idaho where they will possibly manufacture it from wheat
6 or barley or, well, millet, if they get into it, but
7 wheat and barley and corn.

8 And they're also looking at possibly using
9 some of the product coming out of the dairies. But we
10 have a problem we just faced with what took place
11 September the 11th. We've had that problem, and it
12 continually occurs that we import over 56 percent of all
13 our refined oil in crude at this time.

14 We sit here, and I see letters to the editor
15 in the paper complaining about the price of gasoline.
16 And as we sit here in Boise we are basically at the
17 mercy of one pipeline and a couple large oil companies
18 who maintain the majority of the market.

19 And I dread what's going to happen in the next
20 year to two where the largest -- one of the largest
21 sellers of fuel here in the valley has just acquired the
22 other. Chevron has purchased Texaco, and it's going to
23 be interesting to see what the prices are when they sit
24 across the street from one another or which station will
25 be closed.

1 The independent dealers that use ethanol as an
2 octane enhancer, the fact is when you add a 10 percent
3 blend of ethanol to the fuel, you reduce your carbon
4 monoxide emissions by about a third, 30 percent.

5 Since 1988 the Denver front has been using
6 ethanol or oxygenated fuels to reduce their problem.
7 Denver had a major carbon monoxide problem, that brown
8 cloud. In that time, in the first three years they
9 changed from a -- they were using -- 95 percent of the
10 fuel was being blended with a product called MTVE,
11 methyl tertiary butyl ether, which contains 42 percent
12 methanol.

13 However, in three years that reversed itself
14 so that they've been using 95 percent ethanol blends
15 rather than the MTVE. The MTVE has been phased out.
16 It's found to be a water contaminant and a problem.
17 California has banned it.

18 As of next year it will not be allowed to be
19 used within the state of California. And there's about
20 nine other states that have banned it or restricted its
21 use. It's used by the refiners as a good oxygenator.
22 It does add oxygen to the fuel, does reduce the carbon
23 monoxide, but it has some side effects.

24 They prefer to use it because they can
25 manufacture it and it's an economic benefit to them to

1 use it. That's why they objected to the ethanol. And
2 unfortunately, some of these things have come out have
3 been myths rather than facts.

4 There's been confusion between methanol and
5 ethanol, and we like to try and educate the public and
6 the mechanics accordingly what the benefits are of the
7 ethanol. The big factor with the ethanol is when you
8 put a 10 percent blend in, you also increase the octane
9 of the fuel by three octane numbers. You've seen that
10 little black and yellow sticker on the side of the pump.
11 And if you have a high performance vehicle,
12 you usually prefer that you have at least an 87 octane
13 fuel. Most cars today are designed to run on 87 octane.
14 Some larger vehicles are designed to run on higher
15 octane, 90 and above. Older vehicles run better on 90
16 and above.

17 They also -- and I talked to a number of the
18 emissions people over the years, and I've testified in
19 the past to the Ada County Air Quality Board over the
20 last ten years at different times, that they found that
21 the ethanol works; otherwise they wouldn't use it as
22 this alternative, as you see it in the SIP plan, that
23 they would come up with a mandate.

24 I don't know if we need a mandate. I don't
25 think we need a mandate today, but I do think we need

1 some aggressive public agencies taking the major step to
2 lead to the public to utilize the fuel and use it in
3 their programs.

4 I have to tell you that Ada County Highway
5 District has been using it in all their vehicles out
6 there for the last eight months that I can count up
7 right now. So I really just wanted to correct anything
8 that came about in terms of confusion between methanol
9 and ethanol, and they're not the same.

10 And if either of these gentlemen would like,
11 after the meeting I'd be happy to get your names and I'd
12 get you some literature and such that would include the
13 booklets that are used by GM in their training centers
14 for the mechanics on the fuel program.

15 In fact, there was a brief spot on TV tonight
16 on Fox news where Ford has it. They're running a lot of
17 vehicles now with 85 percent ethanol. In fact, we just
18 went to the plant, and their small pickup trucks,
19 Tauruses, the S-10 pickups and the GM now has -- the
20 Yukons and the Suburbans and such running on 85 percent
21 blends of ethanol, so it's not a product that is
22 negative or harmful to the vehicle.

23 HEARING OFFICER: Thank you, Mr. Glancey.
24 Steven Olsen?

25 ///

1 STATEMENT BY STEVEN OLSEN

2

3 MR. OLSEN: My name is Steven Olsen. I am an
4 attorney with the law firm Huntley Park here in Boise,
5 and I represent several station owners, emission control
6 station owners, who have some concerns about the plan as
7 proposed.

8 Several of them are here with me, and they've
9 asked me to speak on their behalf tonight. As I have
10 reviewed this plan, it appears to me that a substantial
11 or a significant reason why we have a decrease in
12 emissions in Ada County has been due to the testing that
13 has been -- that was implemented back in 1984, the
14 emissions testing that was implemented back in 1984.

15 On page 26 of the proposed plan underneath the
16 subheading C, the first sentence there says, "For 1995 a
17 reduction of 32,889 kilograms per day of carbon monoxide
18 can be attributed to the Ada County vehicle inspection
19 and maintenance program. This equates to 16.2 percent
20 of total daily carbon monoxide emissions.

21 And then moving down to the second paragraph
22 it says, "The vehicle inspection and maintenance program
23 operated by the Ada County Air Quality Board was
24 instituted in 1984. Vehicles registered in Ada County
25 are required to pass the emissions test or face

1 revocation of registration. Subsequent to the
2 implementation of the vehicle inspection maintenance
3 program, exceedences of the eight-hour carbon monoxide
4 in AW has dropped steadily from 15 in 1983 to zero only
5 four years later."

6 And the concern of those of the owners of
7 these testing stations is this. That is, this program
8 was implemented -- as implemented and as currently in
9 operation requires an annual test, and as I understand
10 this new plan, Ada County residents would be
11 allowed to test their vehicles only -- instead of every
12 year, the test would be every two years.

13 And our concern is if the program is working
14 as well as it has for years, why change it to admittedly
15 allowing a situation where there would be more carbon
16 monoxide emissions into the air? Because if you test,
17 of course, vehicles every two years you're not going to
18 catch vehicles that fail during that two-year period of
19 time as you would if you would test them every year.

20 And I might just comment very quickly on this
21 gentleman who shared his concerns about having to have
22 testing done on a yearly basis and the cost of that.

23 Idaho right now has the lowest cost for
24 testing emissions in all the surrounding states. And in
25 fact in the surveys that we've conducted, most states in

1 Utah and certainly California, but in states that we
2 might consider more closely aligned to our economic
3 situation -- Utah, Washington and Oregon -- all charge
4 anywhere from \$20 to \$30 per year for their test,
5 being on the low side. More likely 25 to 30.

6 In Idaho right now it's only \$12 a year, and
7 so substantially less. In any case, I also note --

8 MR. KEYS: For the record, I did not complain
9 about the price of the test.

10 HEARING OFFICER: Okay. You can discuss this
11 off the record.

12 MR. OLSEN: I appreciate that. I guess more
13 accurately I was trying to speak to your concern that
14 you are required to have a test on a vehicle that you
15 only drive 300 miles.

16 So on page 24 of this -- of the report, it
17 also indicates underneath the No. 2 heading there, it
18 says -- it's referred to previously. It says, "However,
19 the current SIP, the 1994 minor revision, includes
20 several transit and ride-share measures that are
21 essentially unobtainable and practically are
22 unenforceable."

23 And then in the next sentence on the issue of
24 EPA Region 10 technical systems, DEQ proposed to
25 eliminate the inappropriate measures as specified below

1 and make up the difference in emissions reductions
2 through improvements to other control measures.

3 And in fact as I understand this proposal, it
4 would actually not make up the difference in emissions
5 reductions through improvements to other control
6 measures. It actually would relax control measures by
7 only requiring testing to be done every two years on the
8 vehicles.

9 And so I think -- I think that again we
10 should continue on a yearly testing program in the state
11 of Idaho.

12 And finally, in looking at the report as was
13 introduced by Ms. Hendrickson, on the first page, the
14 third paragraph from the bottom, second sentence, it
15 states, "The EPA assumes the levels will not increase
16 past the health-based standards given that existing
17 control measures remained in effect.

18 And again the control measure that's in effect
19 right now is the annual test. And so again we strongly
20 feel that part of this plan should be what is presented
21 here, and that is the existing control measures should
22 remain in effect.

23 There should still continue to be a yearly
24 testing program that back in 1984 -- from 1984 to 1988
25 -- resulted in a substantial decreases in carbon

1 monoxide. Now, there's one part of this report that
2 suggests to me that in fact what is contemplated is an
3 annual testing, and this is actually Appendix B.

4 And I may not completely understand the
5 context of this appendix, but in Appendix B of this
6 report, which is on page 5 of 161 pages here, it says in
7 the final -- in describing recent changes to the vehicle
8 inspection and maintenance program, it states as a final
9 bullet, moving from annual to biannual, "Every other
10 year testing was planned to begin in July of 2000, and
11 the emissions inventory reflects this change."

12 I understand that to be some kind of testing
13 that was done in connection with this proposal. Then it
14 states, "The mobile 5-B model used to estimate emissions
15 interprets this change to result in slightly increased
16 carbon monoxide emissions, as vehicles with excessive
17 emissions would potentially not be repaired as often."

18 Finally, the last sentence says,
19 "However the implementation of this change is still
20 under discussion. Since remaining an annual test is
21 actually more protective of air quality, no changes will
22 be made to emissions protections or planning."

23 And it appears to me to be suggesting that in
24 fact we are going to continue with the annual program.
25 The language in the report itself suggests that we

1 should continue on the same path we have been. That's
2 an annual test.

3 And then this final sentence that I've read
4 appears to me to indicate that we should. And so -- or
5 that we are, and so I've tried to interpret this report
6 as best I can.

7 And we have come to the conclusions, one, that
8 as suggested in the proposal, that the existing control
9 measures should remain in effect. We should continue to
10 have yearly testing, and the report to me suggests that
11 would be the case, although there's some ambiguity in my
12 own mind as I evaluate that.

13 Finally, there was a comment made earlier
14 about concern over the kind of testing that was done to
15 determine if Ada County will remain within federal
16 guidelines as far as emissions go. And I think there's
17 some justified basis for that concern.

18 As we have evaluated whether Ada County should
19 go from a yearly testing program to a biannual testing
20 program, we have come across data that was provided to
21 us by a gentleman who is actually involved initially
22 with the -- had some role in the testing programs,
23 Robert Klaus Meyer.

24 And what they have found is that when you do
25 tailpipe testing in newer vehicles, you have about a one

1 percent failure rate. When you do this new testing that
2 was referred to, which is called OBT -- OBD-2 testing,
3 the failure rate for vehicles, instead of being at one
4 percent, goes anywhere from 2.2 percent for vehicles
5 that are one to two years old to 5.8 percent for
6 vehicles that are three to four years old.

7 And so what happens is that as -- and this
8 OBD-2 testing is set to begin in Ada County this coming
9 year, so what happens is consistent intuitively, you
10 might feel. With more -- with newer technology you're
11 going to pick up greater -- you'll have better testing.
12 The stats actually show that.

13 That is, with this new testing that's being
14 done on new vehicles, they're able to test more
15 accurately, and so they find that the newer vehicles are
16 failing the emissions testing at an ever higher rate
17 than with the old testing, and so we always -- the
18 emission control stations also have concern about a plan
19 that's been presented that is based on older technology
20 with older testing methods that likely is not giving the
21 kind of accurate testing that we could -- we would
22 receive with newer technology, which again brings me
23 back around full circle.

24 Again points to us -- points out to us the
25 importance of keeping us -- the testing at an annual

1 rather than a biannual project because we're going to
2 get much more accuracy.

3 Finally, it seems that if we're able to --
4 that the part of this plan actually benefits everybody
5 if we are able -- if we continue at an annual testing
6 rather than a biannual testing that the public in
7 general will benefit.

8 And there will be less concern about having to
9 go to some of these other alternatives if we're out of
10 compliance in four or five years.

11 HEARING OFFICER: Thank you, Mr. Olsen. Penny
12 -- is it Steadman? Would you like to speak? Would you
13 spell your name for the record?

14

15 STATEMENT BY PENNY STEADHAM

16

17 MS. STEADMAN: My name is Penny Steadman,
18 P-e-n-n-y S-t-e-a-d-h-a-m. I happen to be one of those
19 folks from Canyon County, and I think that we should
20 remain with the nonattainment the way that it is right
21 now with the carbon monoxide.

22 I personally would be more than happy to go in
23 and have an annual test for my car. I know there are a
24 lot of people in Canyon County that should do that and
25 probably would not pass. And of course some of those

1 pollutants that are coming from Canyon County are not
2 coming into Ada County, and I know we have a big power
3 plant coming in out there.

4 I just wish that they would also look at
5 Having some testing. I wish our commissioners, Canyon
6 County Commissioners, would consider having emissions
7 testings also. And that's it.

8 HEARING OFFICER: Thank you. Delores or David
9 Cram.

10

11 STATEMENT BY DAVID CRAM

12

13 MR. CRAM: My name is David Cram. It's
14 spelled C-r-a-m. I also live in Canyon County west of
15 Nampa. I also, as Penny Steadham has indicated, would
16 favor an automobile testing program in Canyon County.

17 I think it's one of the ways to get the
18 emissions under control. It would require me to test
19 something like seven vehicles, and I still think it's
20 important for the air shed, to maintain the air shed,
21 and I really can't understand why the state agency wants
22 to take the step of reducing the requirements to
23 maintain this air shed.

24 And I don't know why that is. I can't
25 understand why we wouldn't want to maintain the quality

1 of the air shed we have. Why take the step of reducing
2 the requirements, and then wake up five or six years
3 down the road and have to implement maybe quite more
4 stringent requirements.

5 So I'm in favor of the continuing our current
6 process and looking at the long-term, what the
7 long-term is for our air shed. Yes, it will affect me.
8 It will require me to do more things, but I should
9 probably be doing that anyway because I benefit from
10 good air shed, and I think anybody that benefits from
11 good air shed ought to be willing to step up to the
12 plate.

13 So I think that the Department of
14 Environmental Quality should look at the citizens who
15 are here and saying, "Wait. We're willing to do our
16 share." And I don't think this is a good plan, to
17 reduce the requirements. I really don't. That's all I
18 have.

19 HEARING OFFICER: Thanks, Dave. Is there
20 anybody who signed in on the roster who indicated they
21 did not want to testify who has changed their minds as a
22 result of anything they heard here night?

23 Is there anybody who has already testified
24 that would like to make a second brief comment?

25 MS. ULLMAN: Can I make one brief comment?

1 HEARING OFFICER: Certainly.

2

3 FURTHER STATEMENT BY SHARON ULLMAN

4

5 MS. ULLMAN: I agree with all the comments I
6 hear all the time, the concern about Canyon County not
7 testing. There are a huge number of vehicles coming
8 into Ada County from Canyon County, and it is my
9 understanding that the Canyon County Commissioners are
10 right now in the process of configuring an emissions
11 testing program, so I think that will be happening in
12 the very near future.

13 I've actually encouraged them to join our
14 program, but apparently they -- for political reasons
15 they don't want to be part of ours; they'd rather do
16 their own. But I think that they will probably --
17 they're looking at possibly modeling their program on
18 our program, so it's coming.

19 HEARING OFFICER: Thank you, commissioner.
20 Anybody else?

21 This hearing having been commenced at seven
22 o'clock -- and it is now 8:05 p.m. -- is now closed.
23 The record, together with the exhibits, will be
24 transmitted to the Idaho Department of Environmental
25 Quality.

1 Anyone wishing to submit further comments
2 should address them in writing to Gary Reinbold,
3 R-e-i-n-b-o-l-d, Department of Environmental Quality,
4 1410 North Hilton, Boise, Idaho, 83720.

5 All final written comments must be received at
6 the noted address by five o'clock p.m. on November 28,
7 2001. Before we conclude, does anybody have any written
8 comments they want to submit tonight that didn't end up
9 in the record?

10 MR. KEYS: What is the deadline for a written
11 comment?

12 HEARING OFFICER: Tomorrow at 5:00 p.m And if
13 there are no other ones, then the sign-in roster, a
14 two-page document, will be marked and admitted as
15 Exhibit A, and the hearing is now closed.

16 (Hearing Exhibit A was marked for
17 identification.)

18 (The hearing concluded at 8:05 p.m.)
19
20
21
22
23
24
25

REPORTER'S CERTIFICATE

STATE OF IDAHO)
) ss.
COUNTY OF ADA)

I, ROBYN DANE, CSR and Notary Public in and for the
State of Idaho, do hereby certify:

That said hearing was taken down by me in shorthand
at the time and place therein named and thereafter
reduced to typewriting under my direction, and that the
foregoing transcript contains a full, true and verbatim
record of said deposition.

I further certify that I have no interest in the
Event of the action.

WITNESS my hand and seal this 5th day of December,
2001.




ROBYN DANE, CSR, Notary Public

My Commission Expires: 7-18-06

Sign-In Roster

Public Hearing on the Northern Ada County Carbon Monoxide Limited Maintenance Plan

Location: Department of Environmental Quality, Conf. Rm B

Date: November 26, 2001

Project: Northern Ada County Carbon Monoxide Limited Maintenance Plan

Name (Please Print)	Mailing Address	Organization Represented (If Any)	Do You Wish to Testify? (Yes/No)
Sharon Ullman	9627 W. Desert Ave. Boise, ID 83709	Ada County (Air Qual Board)	yes
Dale R. Tankersley	13951 W. Elmsprings St Boise, ID 83713	Personal	Yes
LYNN OSTER	PO BOX 44593 Boise ID 83705	Personal	Yes No
John Dyer	176 Rainbow Boise	Personal	No
DALE KEYS	3496 Forsythia Boise 83703	Personal	Yes
Steven Olsen	150 S. 5th St Boise ID	Commission (Central Station)	Yes
WARREN BEAN		ADA AIR QUALITY BOARD	No
Erv Olsen	800 Industrial Way Mer 83642	COMPASS	No
GARY RICHARDSON	746 SANTA PAULA BASE 83712	ICAF	?
Milena Arthur	4006 Irving St Boise, ID 83706	None	NO
Jonathan Linger	4006 Irving Boise 83706	NONE	No
Bill Banil	P.O. Box 500 Boise ID 83201	algal Baker	No



Sign-In Roster

Public Hearing on the Northern Ada County Carbon Monoxide Limited Maintenance Plan

Location: Department of Environmental Quality, Conf. Rm B

Date: November 26, 2001

Project: Northern Ada County Carbon Monoxide Limited Maintenance Plan

Name (Please Print)	Mailing Address	Organization Represented (If Any)	Do You Wish to Testify? (Yes/No)
Barbara Bechner-Kane	318 E. 31 st Garden City, Id 83741	ACHD	
Dan Buersteltz	5473 S Broadway Way Boise 83716	Self	Possibly yes
BILL COOK	136 RAINBOW BOISE 83713	E.T.C.	NO
Jim GLANCEY	P.O. Box 8043 Boise ID 83707	Wyoming Ethanol	Possibly yes
Perry Steadman	10155 Gabica Middletown, Id 83644	Citizens For Responsible Land Use	maybe
Delois & David Carr		Citizens for Resp. Gov.	?

Appendix H-4. Responses to Comments

State of Idaho, Department of Environmental Quality
Responses to Comments and Questions Submitted during a Public Comment Period
for the
Limited Maintenance Plan for the Northern Ada County
Carbon Monoxide Not-Classified Nonattainment Area
(Limited Maintenance Plan)

Introduction

The public comment period for the *Limited Maintenance Plan* was held from October 23rd, 2001 through November 28th, 2001, as required by IDAPA 58.01.01.578.04 (*Rules for the Control of Air Pollution in Idaho*), 40 CFR 51, Appendix V, 2.0. Criteria, and Section 110 of the Federal Clean Air Act. A public hearing was held on November 27th, 2001, in accordance with these rules.

Comment packages that included the *Limited Maintenance Plan* and associated appendices were made available at DEQ's State Office in Boise, DEQ's Regional Office in Boise, and the Boise Public Library. Comments were received by DEQ through postal mail, electronic mail, and verbal testimony at the Public Hearing.

Public comments regarding the air quality aspects of the *Limited Maintenance Plan* have been summarized below. Due to the similarity of many of the comments received, the summary presented below will have some comments that have been combined and/or paraphrased in order to eliminate duplication and provide a more concise summary. Questions, comments, and/or suggestions received during the comment period that do not relate to the air quality aspects of the *Carbon Monoxide Limited Maintenance Plan* are not addressed.

Public Comments and DEQ Responses

Comment 1: Several public comments were submitted to DEQ stating that ridesharing and transit control measures should not be eliminated. One commenter noted that in the San Francisco Bay area, transit measures were allowed as control measures.

DEQ Response 1: An area may adopt the control measures of their choosing, as long as the measures will reduce emissions. However, control measures must be permanent and enforceable.

Transit and ridesharing typically rely on voluntary participation, which can not be guaranteed. It is unrealistic to expect to mandate the use of ridesharing or transit in order to meet the emissions reductions goals for these measures. Transit and rideshare measures are essentially unenforceable. While DEQ advocates the continued operation and use of rideshare and transit as valuable methods to reduce carbon monoxide emissions, they are inappropriate for use as identified control measures.

However, significant improvements have been made in the Vehicle Emissions Testing Program control measure. These improvements more than outweigh the reductions claimed for the transit and rideshare control measures. EPA has indicated via telephone discussion that the transit and rideshare control measures can be eliminated and made up for by improvements in the Vehicle Emissions Testing Program.

Comment 2: How was the 19,073 kilograms per day reduction due to the improvements to the emissions testing program determined?

DEQ Response 2: Appendix A-4 documents these calculations, based on emissions estimates from the Mobile 5b model.

Comment 3: Several public comments were submitted to DEQ addressing concerns about the impact to air quality if the Vehicle Emissions Testing Program is changed to a biennial, rather than annual test.

DEQ Response 3: Seven changes to the Vehicle Emissions Testing Program are included in the *Limited Maintenance Plan*.

1. Reduction in allowable amount of Carbon monoxide emissions
2. Addition of a standard for hydrocarbon emissions
3. Move from an idle-only test to a two-speed test at idle and 2,500 rpm
4. Separation of test and repair sites
5. Requirement for diesel vehicles to pass test
6. More restrictive waiver policy
7. Change from testing every year to testing every other year

Each of these changes increases the stringency of this program, except for the last. Taken in sum, the overall affect is to reduce mobile source CO emissions by 12%, or 19,073 kilograms per day for year 2000 emissions calculations. EPA has indicated through informal discussion that they do not consider that the Vehicle Emissions Testing Program has been relaxed or made less stringent, since the overall change to the program results in less emissions.

Comment 4: Regarding improvements to the Vehicle Emissions Testing Program: how does requiring a hydrocarbon cutpoint, adding diesel vehicles, expanding the test to a two speed test, and separating test and repair sites have any bearing on emissions of carbon monoxide?

DEQ Response 4: Not all of the changes made have a large impact on carbon monoxide emissions. However, the intent of this section is to fully describe the emissions testing program and changes made to it.

Hydrocarbons: One common way to pass a carbon monoxide emissions test without actually fixing the problem is to make a simple, short term adjustment to the fuel/air mixture. This results in lowered carbon monoxide emissions, but inflated hydrocarbon emissions. Once the vehicle has passed the emissions test, the adjustment can be

reversed. By establishing a cutpoint for hydrocarbons, vehicles must be repaired in order to pass the test.

Diesel vehicles: Diesel vehicles account for approximately 1% of vehicle carbon monoxide emissions in Ada County.

Two-speed test: Many gross emitting vehicles can pass an idle-only test. The two-speed test captures vehicles that are not functioning properly under load.

Separation of test and repair sites: If vehicles fail the initial emissions test, they must be repaired and pass a retest. Nationwide EPA studies have shown that, in areas where testing stations are also allowed to offer repair, it is much more common for vehicles that should also fail the retest to be issued certification of passing. Emissions models factor this feature in when generating emissions estimations.

Comment 5: Several public comments were submitted to DEQ questioning why further changes to the Vehicle Emissions Testing Program were not recommended by DEQ, including a change to exempt first 3-5 vehicle years.

DEQ Response 5: To qualify for the limited maintenance plan option the control measures listed in the most recent Air Quality Improvement Plan must continue to be implemented and may not be relaxed or made less stringent. Seven changes to the Vehicle Emissions Testing Program are included in the *Limited Maintenance Plan*. Each of these changes increases the stringency of this program, except for the change from testing every year to testing every other year. Taken in sum, the overall effect is to reduce carbon monoxide emissions, thereby making the Vehicle Emissions Testing Program more stringent.

However, the EPA has indicated that they would not be comfortable with any additional changes to the Vehicle Emissions Testing Program that may relax this primary control measure without detailed modeling and analysis demonstrating that the changes will not result in new problems. In this case, a full blown Maintenance Plan, including emissions projections, setting an emissions budget, attainment demonstration, or other detailed modeling and complete transportation conformity analyses would be required.

Comment 6: The Vehicle Emissions Testing Program should be changed to require that all vehicles undergoing title transfer first pass the Vehicle Emissions Test.

DEQ Response 6: This change would make the program more restrictive and, therefore, can be initiated at any time by the Air Quality Board.

Comment 7: Several public comments were submitted to DEQ suggesting additional restrictions, including: mandating the use of ethanol blended vehicle fuels, requiring Canyon County vehicles to also pass the Vehicle Emissions Test, addressing vehicles idling at drive-through windows, improving traffic flow by synchronizing traffic lights, controlling emissions from gas powered leaf blowers, and controlling emissions from lighter fluid.

DEQ Response 7: Monitoring data indicates a steady reduction in carbon monoxide levels. Carbon monoxide levels in the area are currently well below the health-based standards. From a regulatory standpoint, no new control measures are required to ensure that levels stay below the standards.

Out of county vehicles not subject to vehicle emissions testing account for approximately 10% of vehicle miles traveled within Ada County. The increased emissions from these vehicles are accounted for in our analyses. Emissions from drive-through windows, leaf blowers, barbecues and other combustion sources are generally insignificant. All identified sources of carbon monoxide emissions are accounted for in analyses.

Comment 8: Several public comments were submitted to DEQ addressing concerns about how growth in the region could result in impaired air quality, and the possibility of being re-designated as Nonattainment for carbon monoxide.

DEQ Response 8: Monitoring data indicates a steady reduction in carbon monoxide levels. Carbon monoxide levels in the area are currently well below the health-based standards. As such, the area is not federally required to do future year emissions projections because it is assumed that emissions growth could not reasonably reach a level high enough to trigger future violations of the standards. Even so, DEQ did prepare future year emissions estimates that considered projected growth in all sources of emissions.

DEQ does not anticipate that the carbon monoxide reclassification will be temporary. However, the *Limited Maintenance Plan* contains specific measures to ensure the protection of the National Ambient Air Quality Standards in the future.

A comprehensive review of the assumptions, demographic data, and estimated vehicle miles traveled used to develop the *1995 Carbon Monoxide Emissions Inventory* will be conducted by 2005 to determine whether the assumptions are still reasonable and descriptive of actual conditions. If actual growth of carbon monoxide emissions exceeds projected growth by 20% or more, or if relative contributions from source categories, in comparison with other source categories, change by 10% or more, an update to the *1995 Carbon Monoxide Emissions Inventory* will be prepared. Based on this data, DEQ will work with EPA Region 10 to determine if a revision of the *Limited Maintenance Plan* is necessary.

The *Limited Maintenance Plan* also includes contingency measures that will be activated if carbon monoxide levels reach a specified trigger. For this *Limited Maintenance Plan*,

triggers will be activated if an exceedance of the National Ambient Air Quality Standards (set at an eight-hour average of 9.0 ppm) occurs, or if eight-hour average concentrations of 8.0 ppm are measured on four or more days within a single winter season. If contingency measures are triggered, all motor vehicle fuels dispensed within the Nonattainment Area will be required to contain a minimum of 10% ethanol to reduce carbon monoxide emissions. This *Limited Maintenance Plan* also provides the option to negotiate different contingency measures with EPA should another, more effective, option be identified.

Comment 9: Several public comments were submitted to DEQ addressing concerns that “the protective non-attainment status” was being removed.

DEQ Response 9: A Nonattainment status does not assign any protection to an area. The Nonattainment designation is assigned to an area where violations of the federal health based standards have been recorded. Nonattainment Areas are required to develop an Air Quality Improvement Plan to rectify the problem. Once the problem has been corrected, as evidenced by long-term reductions in pollution concentrations, it is intended that areas be re-designated as Attainment Areas. The control measures employed to achieve the reduction in pollution levels must remain effective, and the area must continue to maintain the National Ambient Air Quality Standards.

Comment 10: Several public comments were submitted to DEQ addressing concerns that standards were being relaxed or eliminated.

DEQ Response 10: The standards or limits on air pollution concentrations are not changed when an area is redesignated to attainment. The area must continue to maintain the National Ambient Air Quality Standards.

Control measures employed to achieve the reduction in pollution levels must continue to be implemented and may not be relaxed or made less stringent unless detailed modeling is conducted to ensure no adverse impacts to air quality.

Requirements to conduct analyses of transportation impacts (called transportation conformity) are somewhat reduced under the limited maintenance plan option. However, COMPASS has voluntarily agreed to continue performing transportation conformity analyses previously used in Ada County.

Requirements for pollution control equipment on industrial facilities are modified when an area is redesignated to attainment. In accordance with IDAPA 58.01.01.201 et. seq., these requirements only apply to major facilities. In Nonattainment Areas major facilities are required to install Lowest Achievable Emission Rate (LAER) pollution control equipment. After redesignation, major facilities must install equipment that is reasonably available and cost-effective, termed “Best Available Control Technology” (BACT).

Comment 11: Several public comments were submitted to DEQ addressing concerns about impacts of smoke.

DEQ Response 11: Smoke from outdoor burning is a relatively minor source of carbon monoxide emissions (an estimated 6% of total annual emissions), although it is a significant source of emissions of other types of air pollution. There are specific state regulations restricting open burning activities.

Comment 12: Several public comments were submitted to DEQ addressing concerns that the 1995-1996 attainment year and supporting data is outdated.

DEQ Response 12: In determining the appropriate years to base this study on, it was decided to err on the conservative side, and not use the “cleaner” carbon monoxide monitoring data from more recent years. The years 1995 and 1996 are more representative of typical carbon monoxide concentrations in the area.

Good quality emissions inventory data were available for 1995 because an extensive 1995 PM₁₀ emissions inventory had recently been completed. Also, 1995 was the peak year for socio-economic growth. No major point, area, off-road mobile, or on-road mobile emissions sources have moved into the area since 1995.

Better and more complete data is constantly being developed. Constantly revising work to reflect only the most recent data would effectively curb the completion of projects. The years reflected in the existing *Limited Maintenance Plan* are sufficient to satisfy regulatory requirements and to ensure protection of the carbon monoxide NAAQS.

The *1995 Carbon Monoxide Emissions Inventory* is complete, accurate, and accepted by the EPA. Carbon monoxide data collection was not a primary focus of recent work for the PM₁₀ Maintenance Plan in 2001. Although significant data gathering has been accomplished in this effort, the work is not yet complete, nor is the data sufficient to develop a carbon monoxide emissions inventory that could be used for State Implementation Plan purposes at this time. Therefore, DEQ does not see the benefit of revising the *1995 Carbon Monoxide Emissions Inventory* or the *Limited Maintenance Plan* to reflect a more current year at this time.

Comment 13: Inversion weather conditions could result in very high pollution levels.

DEQ Response 13: An analysis of meteorological conditions that contribute to the accumulation of carbon monoxide was conducted for this *Limited Maintenance Plan*. The full text is included in Appendix D. The analysis shows that inversion conditions, which result in high concentrations of other pollutants in this area, do not have the same impact on carbon monoxide levels. Instead, elevated carbon monoxide levels are associated with short term, low level inversions that coincide with rush hour traffic. The incidence of these conditions has actually increased in recent years.

Comment 14: Several public comments were submitted to DEQ stating that air quality has become worse in recent years.

DEQ Response 14: Monitoring data indicates a steady reduction in carbon monoxide levels over time, a trend that continues to this date.

Comment 15: Appendix B contains a section that is unclear. This section explains that biennial testing was calculated, but the change has not yet been made.

DEQ Response 15: This section will be clarified.

Comment 16: The first 4 control measures listed on pages 21 and 22 appear ineffective as control measures for the future, and DEQ must rely on the next 3 for any future exceedance.

DEQ Response 16: Pages 21 and 22 contain a summary of previous Air Quality Improvement Plans, as required for a Maintenance Plan. A description of the permanent and enforceable emissions reductions for this *Limited Maintenance Plan* begins on page 23. This list includes Federal Motor Vehicle Emissions Control Program for new vehicles, transportation control measures consisting of the Ada County Vehicle Inspection and Maintenance Program (Vehicle Emissions Testing Program), and controls on stationary sources, realized by DEQ's industrial permitting program.

Comment 17: The numbers DEQ uses for CO reductions conflict between pages 22 and 26.

DEQ Response 17: The control measures described on pages 21 and 22 refer to those included in the original, 1984 Air Quality Improvement Plan. The control measures described on pages 25 and following refer to those listed in the currently applicable 1994 Air Quality Improvement Plan, and describe how and whether those measures were achieved.

Comment 18: DEQ does not provide enough information about the City of Kuna's compliance with the Vehicle Emissions Testing Program.

DEQ Response 18: The description of the Vehicle Emissions Testing Program included on page 27 is a summary, and readers are referred to the more complete description in Appendix B. Detailed data is inputted to the model used to calculate emissions. The emissions calculations reflect compliance rates, contributions from out of county vehicles, and other factors. Non-participation of Kuna vehicles is included in the data relating to compliance rates.

Comment 19: There is no indication which, if any, of the changes to the Vehicle Emissions Testing Program will provide the additional 19,073 kg/day reduction in emissions, stated on page 27.

DEQ Response 19: Appendix A-4 provides information about the total impact of all seven changes to the Vehicle Emissions Testing Program. In order to calculate the impact of each change separately, individual model runs would have to be performed for each change.

Comment 20: Several public comments were submitted to DEQ addressing concerns about the effectiveness of ethanol blended fuels as a contingency measure.

DEQ Response 20: The use of oxygenated fuels is widely used across the country as a carbon monoxide contingency measure, and was determined to be the most appropriate currently available technique to apply in the Northern Ada County Nonattainment Area. However, the option to adopt more effective measures, if identified, is provided.

Comment 21: Several public comments were submitted to DEQ addressing concerns about that the use of ethanol blended fuels, if triggered as a contingency measure, would damage vehicles or reduce fuel efficiency.

DEQ Response 21: All vehicles manufactured and sold in the United States since the mid-1980's can be run using ethanol blended fuels. In fact, many manufacturers recommend its use. Ethanol is an octane enhancer in addition to reducing carbon monoxide emissions. Methanol can damage vehicles, but is a completely different substance, and is not recommended in the *Limited Maintenance Plan*.

Comment 22: “A better contingency measure recognizes that VMT is driving CO emissions. CO accumulates during the commute hours, and converting SOV to vanpools and rideshares effectively reduces VMT, and CO emissions.”

DEQ Response 22: Contingency measures are intended to promptly correct violations of the carbon monoxide NAAQS. In order to do so, they must be able to make rapid and significant reductions in emissions. The use of vanpools or ridesharing is not appropriate for use as a contingency measure because it is unrealistic to expect to successfully establish a program that mandates their use by the general public.

Comment 23: All references to APA or Ada Planning Association should be changed to COMPASS.

DEQ Response 23: The Ada Planning Association (APA) was renamed as COMPASS in 1999. All references to APA reflect activities, agreements, or work concluded prior to this name change, and, therefore, will not be altered to the new name.

Comment 24: The Idaho Transportation Department (ITD) would like the section on Hot-Spot Conformity analysis to reflect the “Project Level Air Quality Screening, Analysis, and Documentation for Roadway Projects in Idaho” developed jointly by ITD, IDEQ and the Federal Highway Administration in September 2001.

DEQ Response 24: State rules provide that the Interagency Consultation Committee (ICC) evaluate and choose the models and associated methods and assumptions to be used in hot spot analysis. While “Project Level Air Quality Screening, Analysis, and Documentation for Roadway Projects in Idaho” provides an appropriate method of doing so, the ICC has not yet been presented with this document, or made any determinations about whether or not it will be adopted for use in Ada County.

Comment 25: The Idaho Transportation Department (ITD) would like the section on Continuation Of The Build No Build Transportation Conformity Analysis to reflect the “Project Level Air Quality Screening, Analysis, and Documentation for Roadway Projects in Idaho” developed jointly by ITD, IDEQ and the Federal Highway Administration in September 2001.

DEQ Response 25: The methods included in the “Project Level Air Quality Screening, Analysis, and Documentation for Roadway Projects in Idaho” do not address regional conformity analysis.

Comment 26: The Idaho Transportation Department (ITD) would like the section on Conformity Analysis of Regionally Significant Projects to reflect the “Project Level Air Quality Screening, Analysis, and Documentation for Roadway Projects in Idaho” developed jointly by ITD, IDEQ and the Federal Highway Administration in September 2001.

DEQ Response 26: The methods included in the “Project Level Air Quality Screening, Analysis, and Documentation for Roadway Projects in Idaho” do not address all potential regionally significant projects. These methods would only be appropriate for analysis of impact at intersections.

State rules provide that the Interagency Consultation Committee (ICC) evaluate and choose the models and associated methods and assumptions to be used in regional emissions analysis. While “Project Level Air Quality Screening, Analysis, and Documentation for Roadway Projects in Idaho” provides an appropriate method of doing so at intersections, the ICC has not yet been presented with this document, or made any determinations about whether or not it will be adopted for use in Ada County.

Comment 27: The section on transportation conformity states that mitigation measures will be required for projects that would result in an increase in carbon monoxide emissions. The Idaho Transportation Department (ITD) would like the caveat “wherever feasible” to be added.

DEQ Response 27: Federal register 40 CFR 93.116(a) requires the application of mitigation measures for any project that would result in new, more frequent, or more severe violations of the National Ambient Air Quality Standards.

COMPASS has voluntarily committed to conducting Build/No Build analyses. In this analysis, emissions under the Build scenario must not be greater than those in the No-Build scenario.

Comment 28: More recent BUS ridership figures are available.

DEQ Response 28: According to COMPASS data, BUS ridership in 2000 was also at 1.1 million riders. This information will be added.

Comment 29: The 2015 transportation plan was outdated by the 2020 plan. It was completed in 2000 and approved in 2001.

DEQ Response 29: The 1994 Air Quality Plan required that a three-phase transit plan be developed. The first phase was to address the City of Boise. A draft plan was completed in 1995, but was never adopted. The second phase, to address Ada County, was first included in Destination 2015. Destination 2020 also included a transit plan. The third phase, to address multi-county transit, is being developed by VIATrans, initially called the Treasure Valley Regional Public Transportation Authority. We will clarify this information.

Comment 30: The Treasure Valley Regional Public Transportation Authority is called VIATrans.

DEQ Response 30: In 1999, voters authorized the establishment of a Treasure Valley Regional Public Transportation Authority, originally administered by COMPASS. In 2000, it became independent of COMPASS, and was renamed Valley InterArea Transit (VIATrans). This clarification will be incorporated.

Comment 31: The Treasure Valley Transit development plan will be completed in 2002.

DEQ Response 31: This information will be updated.

Comment 32: The ICC voted to change the definition of regionally significant transportation projects in October 2001.

DEQ Response 32: The most recent version of the definition of regionally significant will be inserted.

Comment 33: In the emissions inventory (Appendix A-1), the open burning at the airport is for fire fighting training.

DEQ Response 33: That is clearly indicated on pages 23-27 of the *1995 Carbon Monoxide Emissions Inventory* (Appendix A-1).

Comment 34: The airport fire training facility never had a permit to construct; there was a Director's exemption that restricted fuel use to 54,300 gallons/yr.

DEQ Response 34: Page 26 of Appendix A-1 states that a permit to construct was granted to the airport fire training facility prior to 1995 that limits them to burning 54,300 gallons of jet fuel per year, and prohibits burning between November and March. Actually, these limitations were established via a Director's exemption, issued on June 23, 1992. The exemption was modified several times after 1995, but the total annual fuel limit was not changed until May 31, 2000, when it was limited to 51,197 gallons per year.

Comment 35: I didn't see anything in Appendix C page 29, last sentence of b. regarding emission factors.

DEQ Response 35: Unclear reference.

Comment 36: The limited plan needs to require the use of an emissions budget.

DEQ Response 36: In a limited maintenance plan, the submitting agency is not required to conduct the rigorous and costly work of developing an emissions budget. Because levels of carbon monoxide are well below the standards, it is considered very unlikely that levels will increase past the health-based standards, given that existing control strategies remain in effect.

Even without an emissions budget, the *Limited Maintenance Plan* does contain specific measures to ensure the protection of the National Ambient Air Quality Standards in the future.

A comprehensive review of the assumptions, demographic data, and estimated vehicle miles traveled used to develop the *1995 Carbon Monoxide Emissions Inventory* will be conducted by 2005 to determine whether the assumptions are still reasonable and descriptive of actual conditions. If actual growth of carbon monoxide emissions exceeds projected growth by 20% or more, or if relative contributions from source categories, in comparison with other source categories, change by 10% or more, an update to the *1995 Carbon Monoxide Emissions Inventory* will be prepared. Based on this data, DEQ will

work with EPA Region 10 to determine if a revision of the *Limited Maintenance Plan* is necessary.

The *Limited Maintenance Plan* also includes contingency measures that will be activated if carbon monoxide levels reach a specified trigger. For this *Limited Maintenance Plan*, triggers will be activated if an exceedance of the National Ambient Air Quality Standards (set at an eight-hour average of 9.0 ppm) occurs, or if eight-hour average concentrations of 8.0 ppm are measured on four or more days within a single winter season. If contingency measures are triggered, all motor vehicle fuels dispensed within the Nonattainment Area will be required to contain a minimum of 10% ethanol to reduce carbon monoxide emissions. This *Limited Maintenance Plan* also provides the option to negotiate different contingency measures with EPA should another, more effective, option be identified.

Comment 37: On the bottom of page 21, the percentages quoted for total reduction credit are more than 100%.

DEQ Response 37: Page 21 lists the reductions committed to in the 1984 Air Quality Improvement Plan. In this 1984 Plan, the reductions total 105.7%. The percentages were based on the amount of emissions reduction calculated to be necessary to reach the federal health-based standard. The additional 5.7% percent reduction was intended to keep concentrations below the federal health based standard. This is admittedly somewhat confusing. However, the *Limited Maintenance Plan* must reflect what was written at the time. We will attempt to better explain the percentages listed. The federal health-based standard is based on accumulation of emissions in the ambient air, which can be affected by weather patterns, obstructions, and other factors that make a direct comparison to total emissions difficult.

Comment 38: Several public comments were submitted to DEQ addressing concerns about the adequacy of the monitoring network in the area, and the possible need for updated saturation studies.

DEQ Response 38: Monitoring data indicates a steady reduction in carbon monoxide levels. carbon monoxide levels in the area are currently well below the health-based standards. Saturation studies were conducted in 1991-92 and 1995-96 to determine areas of maximum concentration and ensure that monitors are sited appropriately. DEQ prepares an annual Monitoring Network Review, available for public review and comment, to evaluate the adequacy of the monitoring network. In addition, regular reviews of traffic patterns and volume are conducted to identify any potential hot-spots. Based on analysis of changes in emissions, traffic congestion, and other factors, DEQ periodically updates saturation studies to ensure that monitors are appropriately located. The 1995-96 Saturation Study identified an area with potentially high concentrations near the Boise Towne Square Mall. Funding is being sought to locate an additional carbon monoxide monitor in this area.

Comment 39: Getting through all the appendices and report was painful, and a significant deterrent to public comment.

DEQ Response 39: The public must be provided the opportunity to review and comment on all portions of this *Limited Maintenance Plan*. The choice to review all or portions of the *Limited Maintenance Plan* is up to the individual reviewer.

Comment 40: If the 1994 revision of the Air Quality Plan is good for 10 years, why is DEQ pushing this Plan through early?

DEQ Response 40: DEQ's intention in the preparation of this *Limited Maintenance Plan* is to follow the prescribed pathway set out by the Clean Air Act and federal guidance. This process dictates that, once a Nonattainment Area has resolved the air quality problem, a maintenance plan that will ensure continued healthy air be developed, and that the area be redesignated as a Maintenance Area.

Comment 41: This *Limited Maintenance Plan* relies on already existing emissions control strategies such as the federal new vehicle emissions standards and the already existing vehicle emissions testing program. Additional improvements can not be achieved through this Plan.

DEQ Response 41: The purpose of a maintenance plan is to document that air pollution levels have been brought below the standards, and to commit to continuing the control measures, listed in the existing Plan, that resulted in the improved air quality. No additional controls or improvements are required.

Comment 42: We know that Canyon County impacts emissions levels – why aren't they included in this study?

DEQ Response 42: This *Limited Maintenance Plan* must focus on the identified Nonattainment Area, which is limited to Northern Ada County. However, DEQ is working on with local communities to develop an Airshed Management Program that will reflect the desires and needs of local communities across the airshed.

END OF RESPONSES.